

Bovey Tracey Challabrook BT3

Developer Led  
**Development  
Framework Plan**

Approved 20 September 2016



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## 1 Foreword

- 1.1 In the Teignbridge Local Plan 2013 – 33, Policy BT3 requires “a comprehensive and design – led masterplan for the strategic site allocation, produced with meaningful and continued input and engagement from stakeholders, including measures to mitigate flood risk”.
- 1.2 The Development Framework Plan for BT3 Challabrook, Bovey Tracey, has been prepared by Rule 5 Land in close liaison with Teignbridge District Council and other stakeholders and, has included public consultation. Whilst other Development Framework Plans have been produced by the Council, this document is the first *developer-led* Framework Plan that has been produced following the adoption of the Teignbridge Local Plan.
- 1.3 The document reflects the guidance contained in Teignbridge District Council’s “Technical Note for Development Framework Plans for masterplanning the Strategic Site Allocations”.

## 2 Introduction

- 2.1 This Challabrook, Bovey Tracey Development Framework Document (the “Framework”) has been prepared following public consultation and subsequent revision. The Framework amplifies and clarifies the requirements of Policy BT3 of the Teignbridge Local Plan 2013-2033. This document is the Masterplan required by the BT3 Challabrook allocation policy.
- 2.2 The developer has led the consultation process, which included a public exhibition in Bovey Tracey with support from Teignbridge District Council. Following consultation on the draft Framework Plan, the developer has analysed the responses and revised the Development Framework.
- 2.3 The Framework sets out in more detail how proposals for housing, employment, open space and the required infrastructure at BT3 should be planned, delivered and phased comprehensively and in a sustainable form across the allocation, as required by policy.
- 2.4 The Framework is not a supplementary planning document. It will be presented to the Council’s Planning Committee for approval. It will then be a material consideration in determining planning applications, ensuring that the overall allocation requirements, particularly in relation to planning and delivery, are able to be met. It meets the requirement of the adopted Local Plan for a phasing strategy covering infrastructure and development across the whole site.
- 2.5 Public consultation was held between 4th January 2016 and 12pm on 22nd February 2016, with a public event at the Bovey Tracey Methodist Church Hall, Le Molay-Littry Way, Bovey Tracey, TQ13 9AB on Tuesday the 19th of January from 1.30pm to 6.20pm. This event was attended by 97 members of the public and 80 completed response forms or letters were received during the consultation period.
- 2.6 The contents of these forms and letters has been analyzed by Rule Five Land Ltd and Teignbridge District Council and relevant amendments to the plan have been made. Redacted copies of the response forms and letters can be found at: [www.rulefiveland.co.uk/challabrook/rrf](http://www.rulefiveland.co.uk/challabrook/rrf)
- 2.7 Key Steps for the draft Development Framework are:
  - Consultation: 4th January 2016 and 12pm on 22nd February 2016.
  - Redraft and finalise: February – July 2016.
  - Planning Committee to consider approval of final document – Summer 2016.
  - Thereafter the Framework will be used as a material consideration in determining planning applications.

### The Purpose of the Framework

- 2.8 The purpose of a Development Framework Plan (DFP) is to provide detailed and relevant planning guidance relating to specific developments. DFPs aim to raise the standards of urban design and, to create quality places by coordinating a mixture of land uses and infrastructure, which support sustainable, healthy and active communities. They also ensure meaningful public consultation is undertaken.

- 2.9 DFPs can consider a range of topics including the layout of development, the types of uses to be provided, what infrastructure is required and the timescales for delivering the development.
- 2.10 This DFP for BT3 does not set overly prescriptive details which predetermine a specific layout or design for the whole of the site. It does set some key principles around how buildings and spaces should be designed and, how the types and broad locations of different land uses should be distributed to create a high quality development.
- 2.11 The Framework, once approved, will enable individual planning applications to be considered against a consistent and comprehensive approach, to secure the successful delivery of the allocation as a whole.
- 2.12 The successful delivery of the allocation requires all parties, and those seeking development, to consider and contribute to all the policy requirements. The infrastructure and community facilities set out in BT3 will assist in the development of a thriving community and neighbourhood.
- 2.13 To ensure the Framework is flexible, minor variations from the Framework, for example precise boundary locations of infrastructure based on more detailed evidence will be considered on their merits, and will not lead to the need to revise the Framework. However, if changes are strategically significant to the Framework, for example, major changes in infrastructure timing or location of key development, then a revision to the Framework will be pursued.

## Background Documents

- 2.14 Teignbridge Local Plan 2013 – 2033  
The Teignbridge Local Plan 2013 – 2033 was adopted on 6th May 2014.
- 2.15 Policy BT3 of that plan allocates land at Challabrook, Bovey Tracey for up to 270 homes along with a range of social and community infrastructure and transport improvements.
- 2.16 Policy BT3 can be seen in full in Appendix A. Policy BT3 incorporates the need for a phasing strategy relating to infrastructure and development across the whole site.
- 2.17 This Framework sets out information to facilitate the phasing strategy.
- 2.18 This Development Framework Plan has been prepared taking account of relevant policies contained in the Adopted Teignbridge Local Plan 2013-2033. It should be read in conjunction with the various policies within the Local Plan.

### 3 The Development Framework

- 3.1 The Framework sets out the context for BT3 before describing the area and providing further information in relation to land use and key policy requirements.

#### Development Context

- 3.2 Policy BT3 has been informed by various studies that have set the context and shaped the allocations as proposed. During the evolution of this plan, consideration has been given to the adjoining Conservation Area at the north east corner of the site, the setting of the Dartmoor National Park and the nearby Area of Great Landscape Value (AGLV), the Public Footpath that bisects the site, the Tree Preservation Orders on some trees in the garden of Brookfield House near the southern boundary, as well as the fact that the site lies within the Bovey Tracey Critical Drainage Area and flood zones 2 and 3. The ecology of the site has been considered and in particular the use of the site by Greater Horseshoe Bats and other protected species. This provides a summary of the available information, which does not necessarily indicate an absolute constraint.
- 3.3 Context plan (Plan 1 Appendix B) is included as background information. This plan identifies:
- Flood Zones 2 & 3
  - Settlement Limit
  - County Wildlife Site
  - Scheduled Monuments
  - Conservation Area
  - Listed Buildings
  - Existing cycle routes
  - Tree Preservation Orders (TPO's)
  - Parks and Play Areas
  - BT3 Site Allocation
- 3.4 This plan shapes the Land Use Plan and Framework. Appropriate surveys, information and evidence will need to be submitted with any planning application.

#### Development Areas Plan

- 3.5 Challabrook, is a mixed use development allocation that will function as an extension to the town of Bovey Tracey. Indicative development areas have been identified, which are shown on the Development Areas Plan at Appendix C.
- 3.6 These development areas have been shaped by land ownership, topography and other constraints as identified in the Context Plan, at Appendix B. It is considered that the areas would function individually as well as functioning together across the wider allocation.
- 3.7 The development will be delivered broadly in line with the following phasing:-
- Phase 1 is likely to consist of the whole of development area A and the eastern half of development area B, delivering around 150 homes, including the custom build element of development area B, which is likely to provide 8 of the 14 custom build plots and, 1.00 hectare of employment land (along with the required infrastructure). The remaining custom build plots to be delivered on development area C are likely to be available at the same time or shortly after the first 8. These self and custom build plots could be delivered at any time during the construction of the wider allocation due to its separate (but temporary) vehicular access.



- Phase 2 is likely to consist of the remaining western part of development area B, delivering around 120 homes including any remaining custom build plots and, 0.3 hectares of employment land.

3.8 Consideration will be given to how different phases can be constructed causing the minimal disruption to new residents as they populate the site as a whole.

## Land Use Plan

3.9 The Land Use Plan demonstrates how a sustainable and comprehensive development can be delivered at Challabrook, Bovey Tracey taking account of the constraints and new evidence from the various technical reports, studies and consultation both public and with Devon County Council, the Environment Agency and Teignbridge District Council.

3.10 There are a number of key principles embodied within the Framework as well as the policy text of BT3 and other relevant Local Plan policies, with which compliance is expected. The most important of these principles are:

- Inclusion of green links and multifunctional green spaces
- Delivering a sustainable and connected community
- Provision of affordable housing
- Respecting the settlement limits and heritage assets
- Incorporating biodiversity, consideration of ecology and associated enhancements
- Phased infrastructure delivery
- Highways infrastructure

3.11 The Land Use Plan is included in this document as Plan 3, Appendix D.

## 4 BT3 Challabrook Policy Requirements

- 4.1 A site of approximately 19 hectares is allocated for mixed use development at Challabrook including:

### Criterion (a) - Masterplan

- 4.2 “A comprehensive landscape and design led masterplan for the strategic site allocation, produced with meaningful and continued input and engagement from stakeholders including measures to mitigate and overcome flood risk;”
- 4.3 This document complies with BT3 (Criterion 3.1a) and the Local Plan Policy EN4 “Flood Risk” in the following respects:
- An Illustrative masterplan for the allocation site establishes principles for the design and incorporates landscape strategy and visual impact criteria.
  - All existing significant trees have been assessed and, where appropriate, are to be retained and set within appropriate green spaces distributed through the layout as focal points. Protection for these trees both during and post construction should be in accordance with policy EN12 of the Adopted Teignbridge Local Plan 2013-2033.
  - The existing stone cross monument is to be retained in situ within a landscaped setting as a way marker on the central footpath route and as a feature of the entrance access to the wider development.
  - Hedgerows are to be retained and reinforced as the basis for the retained bat corridors crossing the layout with improved connections between these corridors.
  - The layout responds to the topography allowing a looser layout of lower density individual dwellings interspersed with planting to the upper slopes.
  - Existing hedges divide the site into a series of cells which together with landscape buffers mitigate visual impact beyond the site as informed by the LVIA.
  - The layout compares with and reflects spaces and highway patterns which are part of the established character of Bovey Tracey and will encourage detailed design that will respect the local vernacular and accord with policy S2 of the Adopted Teignbridge Local Plan 2013-2033.

### Mitigating the Flood Risk

- 4.4 The layout is based on engineering advice which will reduce the extent of areas currently identified as Flood Zone 3 and mitigate and overcome flood risk resulting from the development.
- The Challabrook watercourse and adjoining footpath, which run through the heart of the scheme, are being retained within a landscaped green corridor and, will be extended to also incorporate the existing track connection through towards Challabrook Farm and Templars Way.
  - The Five Wyches Brook, which borders the northern perimeter of the site, is also being retained, but will include a minor diversion to accommodate a new bund that will offer increased flood protection to Blenheim Terrace.
  - According to the Environment Agency’s indicative flood map, much of the site lies within Flood Zone 3 of Challabrook and Five Wyches Brook. RMA Environmental Ltd was commissioned to undertake a hydraulic modelling exercise to offer a more accurate assessment of the site’s existing flood zones. This model demonstrated that the true extents of flooding are less than originally anticipated – the approach, assessment methodology and model output are all agreed with the Environment Agency.

- The site falls within the Environment Agency's Critical Drainage Area for Bovey Tracey. Due to the sensitivity of the catchment it was agreed that the lowest (North East) part of the site should be re-profiled to offer additional flood storage, which will reduce the level of flood risk affecting the downstream catchment. The proposed development should also include attenuation areas to restrict the peak rate of flows as recommended by the Critical Drainage Area guidance, currently for a 1 in 1000 year event.
- The lowest (North East) part of the site is to be a substantial 2.2 hectare area of natural open space incorporating the aforementioned flood storage and attenuation areas for each sector of the development and providing ecological and flood risk benefits to the wider community.
- Any development on the site will be required to provide satisfactory drainage infrastructure and shall proportionately contribute towards the flood alleviation measures to be provided in the north east corner of the site.

## Criterion (b) - Employment

4.5 "Delivery of at least 1.2 hectares of land for office, general industrial or storage and distribution as appropriate to the site and its wider context, ensuring that there is a mix of unit size to enable businesses to start up and expand; support will also be given to employment generating uses provided that they are compatible with the immediate surroundings and do not conflict with town centre uses;"

- The Development Framework Plan shows two separate areas for employment uses, which provide a combined area of 1.3 hectares.
- Area G (as shown on the Land Use Plan at Appendix D) is a site of approximately 1 hectare, which fronts onto Monks Way. Although the location adjacent to the main road will bring commercial advantage, the scale, massing and design of buildings erected on this part of the site will need to be appropriate to the context of the site and of good quality. This area of land is immediately adjacent to the principal access and, as such, should be delivered during the first phase of development.
- Area H (as shown on the Land Use Plan at Appendix D) is a site of approximately 0.35 hectares, which would form a buffer between residential areas and Challabrook Farm. This area should provide a courtyard style development of small and medium sized business units. The uses will need to be compatible with the adjacent residential areas C and E. This area should be delivered during the later phases of the development in tandem with the adjoining housing development, or earlier if access can be achieved.
- Development proposals will be expected to deliver the accessed and serviced employment land requirement on site equivalent to 1.2 ha or at a jobs density of 100 jobs per hectare thereof (120 jobs) and, any application that comes forward for development on the site will need to ensure that provision is made, proportionate to the number of homes proposed.
- Early discussions with the Council's Economic Development Officers about the delivery of employment land are encouraged.
- Where difficulties are experienced in bringing forward employment land, the Council will work with landowners and developer interests to explore delivery options to help ensure the employment land is capable of being achieved. These could include independent valuation of the employment land and transfer to the Council.
- Land allocated for employment use should be appropriately managed, maintained and made available for that use.

## Criterion (c) - Housing

### 4.6 “Delivery of up to 270 homes with a target of 30% affordable homes;”

- Local Plan Policy BT3 Challabrook requires the delivery of up to 270 dwellings, which can include a range of house types, sizes and a mix of tenures at average densities of 30 – 35 dwellings per hectare there is sufficient land to deliver 270 homes. It is envisaged that there will be a mix of densities as appropriate in design terms to create distinct character areas with a core area of up to 50 dpha and lower densities of up to 20 dpha to the upper slopes

### 4.7 Affordable housing

- The provision of affordable housing shall be in conformity with Policy WE2 of the Local Plan with a target of 30% and the Council’s emerging Affordable Housing Supplementary Planning Document (SPD). Affordable housing provision below 30% would be required to be robustly justified by full open book viability assessment.
- The location of affordable homes will be distributed throughout all phases of the development. Delivery in small clusters or in small parcels will be likely to be acceptable. An appropriate mix of tenures will be agreed in consultation with Teignbridge Housing Enabling Team at the time a planning application is considered.
- The affordable housing mix will be negotiated on the basis of housing need, while also seeking to ensure that the affordable housing is representative of the overall development housing mix. Early discussions with the Teignbridge Housing Enabling team about the affordable housing mix are recommended.
- The National Planning Framework (NPPF) requires local authorities to make an assessment of housing needs in their areas, including for people with physical disabilities. Planning proposals for BT3 Challabrook will be expected to take into consideration the housing needs locally for more accessible/wheelchair users and other specialist housing. This will form part of negotiations between applicants for planning permission and the Council.
- The affordable housing on this site should where possible be designed and constructed in accordance with policy WE4 of the Adopted Teignbridge Local Plan 2013-2033.

### 4.8 Custom and Self Build

- In accordance with Policy WE7 of the Local Plan at least 5% of dwelling plots for sale will be made available for custom builders. These serviced plots should be concentrated in one or two parcels and brought forward early unless an alternative approach can be demonstrated which secures the overall requirement. They should be located on the site perimeter ideally with a separate perimeter road access entrance, which in addition to easing construction management will enable earlier plot delivery. The Council has adopted a Custom and Self Build Supplementary Planning Document (SPD), which has been subject to public consultation. This provides greater detail on this matter and will help to guide the custom build provision on this development.
- Utilising the constrained site immediately adjacent to the Pottery Leat on the southern boundary (approximately 6 plots) and the area (at the end of Brimley Vale) annotated D in the Land Use Plan at Appendix D, 14 custom build plots are to be included equating to 5% of the total. These are sited to allow early delivery, initially with access from Brimley Vale until such time that the site internal highway infrastructure meets the custom build area, at which time the Brimley Vale access will be restricted

to emergency vehicles, pedestrians and cycles only. The custom build element of this BT3 development should be constructed along with or before phase 1 of the general development.

- If, for any reason, the custom build plots within Area D (as shown on the Land Use Plan at Appendix D) are not brought forward in accordance with the above phasing, they will be provided within Development Areas A and B (as shown on the Development Areas Plan at Appendix C), proportionate to the number of dwellings being provided.

## Criterion (d) – Green Infrastructure

- 4.9 “Green infrastructure and on-site open space incorporating appropriate buffering, landscaping, retention of existing trees and hedgerows and other mitigation measures to address any ecological impacts relating to greater horseshoe bats or landscape impacts relating to the site’s sensitive setting adjoining Dartmoor National Park;”
- 4.10 The scale of residential development at BT3 Challabrook requires an appropriate mix, scale, distribution and quality of public open space. Policy WE11 makes provision for a per dwelling contribution of 10m<sup>2</sup> of Children’s and Young People’s Space and 100m<sup>2</sup> of other forms of green space. This is based on the Teignbridge Open Space Survey and subsequent standards that provide a ‘needs assessment’ for Teignbridge and guidance on a suitable mix of green spaces.
- 4.11 The BT3 Development Framework Plan (DFP)) amplifies and clarifies the requirements of the adopted Local Plan in relation to the BT3 allocation, providing further detail and clarification on requirements for distribution and quality of green space secured through any planning application.
- 4.12 The following table summarises the quantum and different typologies of green space required from the BT3 allocation through this policy process.

Type of Space	Quantity m <sup>2</sup> per dwelling	Open Space Requirement m <sup>2</sup>	Open Space Requirement ha
Formal and informal green space (Park Space)	17	4590	0.46
Active recreation space (Outdoor sports pitches)	27	7290	0.73
Children and young people’s space	10	2700	0.27
Natural green space	49	13230	1.3
Allotments	7	1890	0.19
Total	110	29700	2.9

- 4.13 Throughout this document the quantum of green space are provided as minimums based on a 270 dwelling allocation. Increases/decreases in the proposed number of dwellings will change the level of demand and require a proportional increase/decrease in the area of green space delivered. Likewise, green space should be delivered proportionate to the number of dwellings occupied.
- 4.14 Green space requirements set out in this DFP will be secured through the planning application process, conditions and section106 agreements. As part of any full planning

application or prior to first reserved matters, a Green Infrastructure Vision Statement must be agreed to support and guide the final design. It shall set out the aims and objectives, key design characteristics and location and layout for proposed green infrastructure features and how this contributes toward the wider strategy for the site.

### **Children and Young People's Space**

- 4.15 Definition: equipped and unequipped spaces where children and young people have the opportunity to play or meet safely
- 4.16 Policy BT3 allocates land for up to 270 new homes and as such will require approximately 2700 sq m (0.27ha) of public accessible play space for children and young people, (at a rate of 10m<sup>2</sup> activity area per dwelling). This will be provided on site. Play facilities must be distributed within the allocation to ensure suitable access to all dwellings. Accessibility is determined by minimum straight line distances to play facilities which, for Teignbridge District, are set as 480m for Young People and 240m for Children. In order to satisfy the Council's local provision standards distance thresholds, it is expected to be delivered through one large play area of at least 1500sqm and three smaller areas each of at least 400sqm, as indicated in the Land Use Plan at Appendix D. Each area will be equipped appropriately and there will be a focus on "Play on the way" utilising an outdoor gym and trim trail approach.
- 4.17 Play space must also have the following satisfactory buffers (not forming part of the activity area):

Toddlers / young children:

- A buffer zone of 10 metres minimum depth is required to separate the edge of the activity zone and the boundary of the nearest property. A minimum of 20 metres is required to be provided between the activity zone and the habitable room facade of the nearest dwelling.

Older Children / Teenagers:

- A buffer zone of 30 metres minimum depth is required to separate the activity zone and the boundary of the nearest property.

Buffers between Toddlers/Younger Children and Older Children/Teenagers:

- A buffer zone of 25 metres (minimum) depth is required to separate the edge of the Older Children/Teenagers activity zone (when ball facilities are provided) and edge of the Toddlers / Young Children activity zone.

### **Formal and Informal Green Space**

- 4.18 Definition: landscaped amenity green space most commonly, but not exclusively in housing areas. Includes formally laid out sites that may include flower beds, sensory areas and cycle parking. But also spaces that are informal in layout and character that have few formal facilities.
- 4.19 Based on 270 dwellings, the total requirement for Formal and Informal Green Space on BT3 is approximately 4590sqm (0.46ha) at a rate of 17m<sup>2</sup> per dwelling. This green space forms an integral element of the site's overall design and is located so as to provide accessible focal points for the development. Accessibility is determined as within 600m straight line distance. The central "green", which is located so as to enhance the setting of the listed cross, will provide approximately 4000sqm of informal greenspace and the public footpath, which leads through the site to Challabrook Farm, will provide at least 4500sqm of informal greenspace.



- 4.20 Additional focal points and efficient land use can be achieved through providing buffer areas to required play spaces, as above.

### **Allotments**

- 4.21 Definition: areas of space, not publicly accessible, set aside for growing crops and let to residents on an annual basis.
- 4.22 Based on 270 dwellings, the development at BT3 requires 1890sqm of allotments, at a rate of 6sqm per dwelling. The DFP identifies an area of land approximately 2300sqm in area. Allowing for parking of 10 cars (including one disabled space) and general access, at least 1890sqm of allotment space is shown on the Land Use Plan at Appendix D. It is envisaged that there will be six 250sqm and three 130sqm allotment plots along with access paths.
- 4.23 Allotment sites:
- Shall be laid out with standard full (10m x 25m) and half (10m x 12.5m) plot sizes connected by a suitable path network;
  - Shall provide one wheelchair accessible plot per allotment site
  - Shall have vehicle access, be connected to cycle and pedestrian network and have vehicle and cycle parking;
  - Shall not be in the floodplain or attenuation ponds, or over-shadowed by land, buildings or vegetation that may inhibit productivity;
  - Shall have suitable boundary treatment and gates to prevent public access;
  - Shall contain cultivatable soil demonstrated where necessary by soil testing; and
  - Shall have access to water.

### **Natural green space**

- 4.24 Definition: sites where the predominant function is to compensate for developments' impact on wildlife and provide people with access to, and experience of nature.
- 4.25 Based on 270 dwellings, the total requirement for natural green space on BT3 is approximately 13,000sqm (1.3ha), at a rate of 50sqm per dwelling.
- 4.26 The natural greenspace is provided in areas throughout the site.
- 4.27 An area of approximately 3900sqm (0.39ha) is provided by way of the "bat corridor" along Pottery Leat at the south of the site.
- 4.28 Planted buffers will be provided along the watercourses that cross the site. The length of the watercourses (not including the public footpath or bat corridor) within the site amounts to approximately 750m. Even if these buffers are no more than 10m in width, the area of natural greenspace would amount to 7500sqm (0.75ha) alone.
- 4.29 The attenuation and flood mitigation area will provide an enhanced wildlife habitat. Excluding the area that will be used for play space (1500sqm/0.15ha) it is in excess of 19000sqm (1.90ha) of which over 13000sqm (1.3ha) will be normally dry with approximately 6000sqm (0.60ha) of wetland habitat.
- 4.30 In total, the area of natural greenspace shown on the Land Use Plan, at Appendix D, is in excess of the required minimum.

## Active recreation space

- 4.31 Definition: those areas which are formally used for a variety of organised and competitive sports. They can either be fixed sports space (tennis courts/bowling greens etc.) or seasonal sports space (football/cricket).
- 4.32 Based on 270 dwellings, the total requirement for active recreation space on BT3 is approximately 7300sqm (0.73ha) at a rate of 27m<sup>2</sup> per dwelling. This area of land would amount to a single sports pitch. Sports pitches are most successful where they are clustered together and/or sited alongside other facilities, such as schools or parks and are impractical to maintain where sited in isolation. Therefore, rather than providing on-site sports pitch, any provision where feasible and viable will be provide off site.
- 4.33 The design of all Green Infrastructure shall, where appropriate, accord with the emerging Design Guide that is currently being produced by Teignbridge District Council.

## Criterion (e) – Sustainable Movement

- 4.34 “Pedestrian and cycle footpath provision to ensure permeability through the site including towards the town centre, and to local facilities on Ashburton Road”
- Internal roads should be designed to Manual for Streets principles with low design speeds. Residential roads should be suitable for cycling and provide attractive environments for pedestrians. A road hierarchy leading from the main site access and looped layout should be developed. Shared surfaces may be appropriate where flows are very low. Streets and footpath connections should benefit from natural surveillance with overlooking by buildings.
  - The Land Use Plan at Appendix D shows sustainable movement to and from the site can be achieved and indicates footpath and cycle links connecting with the wider area. A new footpath will be provided along Monks Way. This will connect the main site entrance (at the south of area G on the Land Use Plan) with a pedestrian crossing point in the position of the existing public footpath crossing point (between areas J and G on the Land Use Plan). It will then continue along Monks Way towards the Fire Station roundabout and connect to the existing footpath network and to the town centre. Additionally, the crossing point over Monks Way will allow pedestrians to use the existing public right of way along Avenue Road to gain access to the town centre, school and community facilities.
  - The cul-de-sac at Brimley Vale will provide pedestrian and cyclepath links. The cycle links will allow access to the National Cycle Network Routes 28 (which runs from Okehampton to Plymouth via Moretonhampstead, Newton Abbot, Totnes and Salcombe) and 272 (Buckfastleigh to Bovey Tracey). It will also be used initially to provide vehicular access to the custom build part of the site whilst the internal site roads are being constructed. Once these are constructed, the Brimley Vale access will be for emergency vehicles, cycles and pedestrians only.
  - Existing bus stops at Parke, Dolphin Square, St Johns Church and Brimley serve the site through the bus routes 39, 41, 178, 193, 671 and MS3. The developers will be expected to work with the local Highway Authority to promote sustainable transport use.

## Criterion (f) – Bat Mitigation Plan

- 4.35 “A bespoke Greater Horseshoe Bat mitigation plan for Challabrook must be submitted to and approved before planning permission will be granted. The plan must demonstrate how



the site will be developed in order to sustain an adequate area of non-developed land as a functional part of the foraging area within the SAC sustenance zone and as a part of the nearby strategic flyway used by commuting Greater Horseshoe Bats associated with the South Hams SAC. The plan must demonstrate that there will be no adverse effect on the SAC alone or in combination with other plans or projects.”

- 4.36 This requirement is in addition to the requirements of Local Plan Policies EN9, EN10 and EN11.
- 4.37 Mitigation measures for GHBs should support the SAC Conservation Objectives set by Natural England and also promote Favourable Conservation Status for this species. As such, mitigation measures for BT3 should aim to:
- 4.38 Facilitate ease of movement and conserve energy expenditure by Greater Horseshoe Bats by providing optimal daily and seasonal commuting routes around and through the proposed new built up areas and by retaining and enhancing foraging and roosting opportunities.
- 4.39 In order to achieve the above aim, and to provide the certainty necessary to satisfy the requirements of the HRA process, the following mitigation principles must be incorporated into the development of BT3. This mitigation must then be secured and implemented in full at such time as development applications are brought forward. Such mitigation should be a combination of identifying and recognising:
- key design constraints required to avoid or minimise adverse effects, and;
  - habitat mitigation/enhancement opportunities to provide overall net gains for GHBs specifically and for wider biodiversity in general.
- 4.40 The following Design Principles should be followed to:
- i. Ensure that the development proposals do not sever key habitat connectivity and thus hinder the potential for daily commuting and seasonally migrating bats to move through the Ashburton Rd/Monks Way pinch point in an east-west direction, so that they are able to reach open countryside and near optimal foraging habitat on either side of Bovey Tracy. This to be achieved by protecting the functionality and integrity of sufficiently high quality commuting habitat through the site through the following measures:
    - a. Provision and long-term maintenance of a dark landscape corridor beside the Bovey Pottery Leat that is at least 15m wide at its narrowest point and has light levels within it from adjacent new build of no greater than 0.5 lux, as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
    - b. Provision of a hedge bank along the above corridor, the inner toe of which should be at least 15m from the edge of the Leat, in order to provide a buffer from both physical disturbance and light spill from proposed adjacent detached self-build properties;
    - c. Construction of no buildings within 25m of the edge of the Leat;
    - d. Provision of variability in the width of the corridor along the Pottery Leat. The width of the corridor should be as wide as is practicable reflecting the fact that the existing fields are irregular in width. In other words, the corridor may have bulges along it which may act as further foraging opportunities for bats, especially if planted with low growing shrubs and fruit trees to attract insect prey. Provision should also be made for temporary night roosts to enable commuting bats to rest during the night;
    - e. Provision of habitat enhancement through the upgrade of public realm lighting around the junction of Brimley Vale and Ashburton Road e.g. with new more bat friendly street lighting (e.g. with light in the warmer part of the spectrum)

- ii. Protect the functionality and integrity of sufficiently high quality commuting habitat along the green corridors planned between Areas 'A' and 'B', Areas 'A' and 'G', Areas 'B' and 'C', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
- iii. Achieve no overall net loss of hedgerows and trees within BT3;
- iv. Avoid light spill in bat flyways and foraging areas i.e. achieve light levels less than 0.5 lux;
- v. Minimise potential interruption of bat corridors by the new road network and especially for the proposed roads through:
  - a. the central hedgerow and watercourse between Areas 'A' and 'B', and Areas 'B' and 'C', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
  - b. the mature hedgerow between Areas 'A' and 'F', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;

NOTE: Road mitigation to be achieved through a combination of sensitive ground shaping (e.g. earth bunds, banks and cuttings), sensitive lighting design, sympathetic landscape design, vehicle speed restrictions and vehicle 'calming' measures<sup>1</sup> - in order to avoid and reduce risk of vehicle collision with bats and to avoid disturbance caused from artificial light spill into flight routes<sup>2</sup>;

- vi. Ensure that any public footpath / cycleway through and/or along the bat corridors are either unlit or are lit through a very carefully designed scheme that minimises light spill in sensitive locations, while at the same time providing a safe and adequately lit route for pedestrians and cyclists.
- vii. Ensure that the provision of areas of public realm open space in or near the bat corridors identified – while being potentially multifunctional - are designed and maintained to also provide habitat for commuting and foraging greater horseshoe bats.

#### 4.41 Habitat Mitigation/Enhancement Opportunities should where appropriate:

- viii. Undertake tree planting in order to provide more diverse foraging habitat for GHBs;
- ix. Mitigate (both on and offsite site where necessary) for the loss of hedgerow (flyways) and foraging habitat (pasture);
- x. Provide landscape buffers at least 10m wide between bat flyways/foraging habitat and the newly built development in Areas 'A', 'B', 'C', 'D' and 'G', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
- xi. Create two new bespoke greater horseshoe bat roost(s)<sup>3</sup> to support and improve the number and distribution of satellite roosts; these to be in appropriate locations either within the green infrastructure in BT3 or within the surrounding landscape;

<sup>1</sup>One of the key measures available to mitigate potential risk of vehicle collisions with bats through BT3 is through the imposition of a speed restriction. This should be possible as a necessary requirement arising out of the Habitat Regulations Assessment of the Challabrook proposals, whereby Devon County Council as the Highway Authority is legally obliged to consider a plan or project (for which it is the competent authority) in the context of Regulation 61 of the Habitat and Species Regulations (2010).

<sup>2</sup>All mitigation aimed at providing safe road crossings for bats must follow the precautionary principle and be informed by latest research and best practice, such as Berthunissen and Altringham (2015) and Grace-Fensome and Mathews (2016).

<sup>3</sup>Examples of such roosts include a night roost/perch in the corridor along the Pottery Leat and/or a more substantial day roost in an appropriate location that may be either on site or offsite with the agreement of an appropriate landowner.

- xii. Contribute appropriately to the replacement of existing light columns on the northern edge of the car park on Station Road with more bat-friendly lighting, in order to achieve a darker corridor along the river as it passes through the pinch point between the car park and Devon Guild of Craftmans' Gallery.

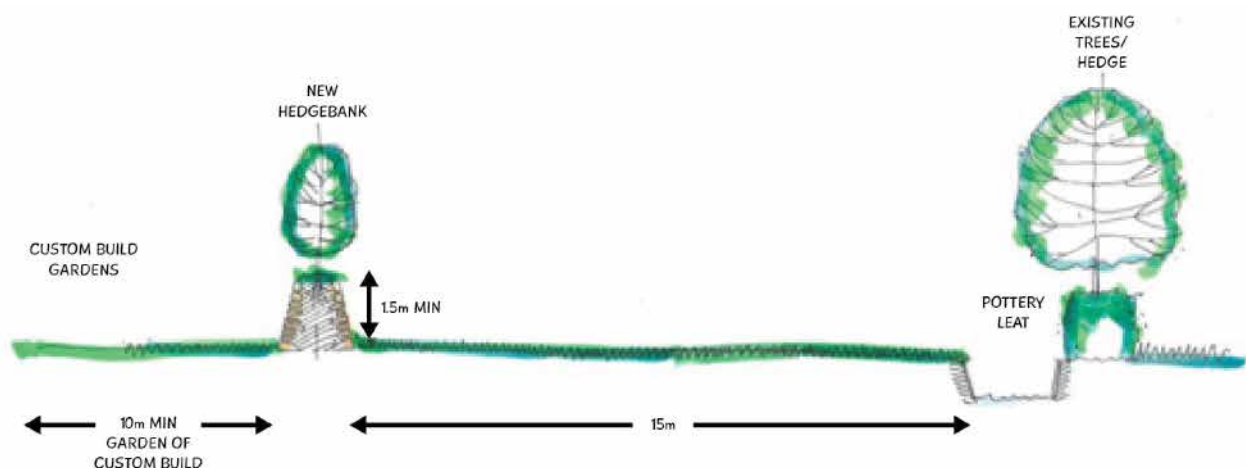
NOTE: The above proposals for bespoke new roosts and lighting measures are entirely consistent with paragraph 118 of the National Planning Policy Framework – where development may be expected to contribute to biodiversity enhancements. Furthermore, such measures would be particularly consistent with Regulation 39, especially where these augment other mitigation measures that seek to ensure connectivity across the landscape for greater horseshoe bats.

- xiii. Provide long-term habitat management, for bat flyways and greenspace through a Landscape and Ecological Management Plan (LEMP), secured through a planning condition and/or obligations;
- xiv. Implement development through the means of a prior-approved Construction Environmental Management Plan (CEMP), secured through a planning condition;
- xv. Undertake appropriate and proportionate ecological monitoring of the LEMP to establish the effectiveness of proposed mitigation measures and to provide early warning of any necessary contingency or remedial measures required to meet original objectives;

#### 4.42 Pottery Leat/Southern Boundary

- The southern boundary and the pottery leat that runs along it presents an opportunity to provide mitigation measures for the Greater Horseshoe Bat and other bat species whilst protecting the pottery leat at the same time. A 15 metre wide (from edge of hedge bank to the edge of the pottery leat) linear buffer will be created as per the sketch below. This will extend along this southern boundary as far as the allotment area, where the new hedge bank will turn to run north/south, creating a buffer between the allotments and the low density custom-build area. In addition there shall be no built development within a zone of 25 meters from the Pottery Leat. Together this will create enhanced habitat for the GHB and other wildlife and, will accord with the emerging wider strategy for the Bovey Tracey area GHB's.

#### 4.43 Typical Section through the “dark landscape corridor” for Greater Horseshoe Bats



## Other Policy Requirements

- 4.44 The framework masterplan addresses other policy requirements as set out in the Local Plan. The masterplan illustrates a mixed use layout, taking into account flood prevention, mitigation of protected species issues and, incorporating open spaces and green infrastructure links.
- 4.45 Any planning application should be supplemented by a contextual analysis of Bovey Tracey, which should consider the locally distinctive character of the town, including materials, architecture, street pattern and, in particular, the setting of the adjacent Conservation Area, Dartmoor National Park and the Area of Great Landscape Value (AGLV). The layout is based around the retention of the existing features and seeks to use these as assets to generate a sense of place. The layout also includes measures of mitigation to conserve the status of of Greater Horseshoe Bats.

### Ecology

- 4.46 The development will be undertaken in line with Local Plan policies EN8: Biodiversity Protection and Enhancement, EN9: Important Habitats and Features, EN10: European Wildlife Sites and EN11: Legally Protected and Priority Species to ensure that there is no net loss of biodiversity, that existing areas of biodiversity are protected and enhanced and that European Wildlife sites and protected species are protected.
- 4.47 HRA (Habitat Regulation Assessment) and SEA (Sustainable Environmental Assessment) screening has been undertaken by Teignbridge District Council and are attached at Appendices G and H.

### Landscape and Design

- 4.48 The layout is based around the retention of the existing features and seeks to use these as assets to generate a sense of place.
- 4.49 The site has been subject to a landscape and visual impact assessment (LVIA) produced by Landscape Architects from AECOM. The LVIA has been used to inform the design development through an iterative approach of analysis, design and testing to develop the scheme. As a consequence, a design strategy has been developed which is visually attractive, of excellent landscape architectural quality and with considered, appropriate and locally distinctive landscape treatments, which respects the setting of the Dartmoor National Park.
- 4.50 All development will take account of the requirements of Local Plan Policy 2A "Landscape Protection and Enhancement".
- 4.51 The Council is preparing and will publish a Teignbridge planning area Design Guide Supplementary Planning Document (SPD) for consultation. It is expected that design and access statements and plans submitted for approval as part of any planning application or application for approval of reserved matters will demonstrate how they comply with the emerging Design Guide SPD. Designers should contact Mark Harris on 01626 215750 or [planning@teignbridge.gov.uk](mailto:planning@teignbridge.gov.uk) in the first instance until the document is available to view on the Teignbridge District Councils website.

## Transport

- 4.52 The main vehicular access to the site will be via a new entrance off Monks Way, between areas G and B as shown on the Land Use Plan at Appendix D. After consultation with the Highway Authority, it has been agreed that a new right turn lane will need to be provided for southbound traffic. There is sufficient space within the highway land to provide the right turn lane. The Highway Authority has also confirmed that there is sufficient land to provide the necessary visibility distances for traffic entering and exiting the site. For details regarding pedestrian and cycle links, please see section 3.5 “Sustainable Movement”.

## Heritage

- 4.53 The Development Framework Plan sets out a layout of the site that will enable development to respond to the local character and history of the area, including the sensitive incorporation of the listed stone cross within its setting.
- 4.54 Any planning application will need to be accompanied by a Heritage Impact Assessment to demonstrate that there will be no adverse impacts on the setting of the following nearby Listed Buildings:-
- Parke Lodge
  - Former Railway Station
  - Pludda Thatch, Station Road
  - Little Reeds, Station Road
  - Dolphin Hotel, Station Road
  - 1-6 St John’s Cottages, Newton Road
  - Church of St John the Evangelist II\*, Ashburton Road
  - St Marys, Ashburton Road
  - Five Wyches Farmhouse and barn
- 4.55 The site adjoins the Bovey Tracey Conservation Area to the north east, however the inclusion of the wetland park/flood alleviation and attenuation area provides a robust green buffer between the site and the Conservation Area, which will prevent the new development visually competing with the buildings in the Conservation Area when viewed from Monks Way. The area of woodland in the north western part of the site will also assist in softening the edge of the development where it will be seen in conjunction with the Conservation Area from the Five Wyches lane.
- 4.56 Archaeology: The Devon County Council Historic Environment Services (HES) team have commented on this allocation area as follows:
- 4.57 The landscape around Challabrook farm has been characterized as medieval enclosures based on earlier strip fields. The earliest documentary reference to Challabrook is as Chorlebrooke in the Late 16th Century. The site is crossed by Bovey Pottery Leat. Prehistoric activity in the area is demonstrated by the presence of funerary monument to the south-east and settlement to the north-west. Artefacts from this period have also been found in this area.
- 4.58 Given the size of this development site and the evidence of prehistoric activity in its hinterland, the medieval origin of the landscape and the antiquity of the settlement at

Challabrook the HES would recommend a programme of predetermination archaeological work to be undertaken to support any application to develop this site. This work would take the form of a staged programme of works including geophysical survey and archaeological evaluation of the site. The results of this work would allow the HES to determine the nature and extent of archaeological deposits and formulate a response to any development in the area.

- 4.59 The geophysical survey and initial evaluation have been carried out.
- 4.60 Features such as former hedges and ditches identified in positions anticipated from historic records are to be verified by a program of trench evaluation in accordance with an agreed schedule put forward by the historical environment team at Devon County Council.
- 4.61 All development will need to comply with the requirements of Local Plan Policy EN5.

### **Neighbouring Development**

- 4.62 The detailed layout of the development at the site should take account of the neighbouring residential land uses and, will need to ensure that the amenity of neighbours is not unduly diminished as a result of the development.

### **Contamination**

- 4.63 The ground investigation reports found elevated levels of arsenic and radon to be present at the site. Although this is most likely to be naturally occurring, any planning applications for development of the site will need to be supported by further bio-accessibility Physiologically Based Extraction Testing and appropriate and proportional remediation undertaken if necessary.

### **Renewable Energy**

- 4.64 All planning applications for development of the site will need to be accompanied by a Carbon Reduction Plan, in accordance with Policy EN3 of the Local Plan.

## **Public Consultation**

- The consultation took place between the 4th January 2016 and 22nd February 2016 with a copy of the Draft Development Framework Plan available on the Rule Five Land Ltd website.
- A public exhibition event was held on 19th January at the Bovey Tracey Methodist Church Hall from 1.30pm to 6.20pm.
- The public event was advertised by five A4 brightly colored notices which were posted by the Bovey Tracey Town Council in positions chosen by them.
- During January the consultation process was further advertised by newspaper articles in the local press and flyers handed out by local residents.
- 97 visitors attended the public event and there were representatives and technical consultants from the project team, Teignbridge District Council and the Environment Agency on hand to discuss the draft plan with residents.
- The public were invited to comment on the draft plan and response forms were made available to print and post or to respond online.
- 80 response forms or letters were received which were then analysed to identify areas in the plan that should be modified or varied in any way and any issues that had not already been considered.

- Rule Five Land also attended the Bovey Tracey Residents Association meeting on the 23rd February where the exhibition boards were displayed and a questions and answer session was held. The association was invited to send a letter in response to the consultation, this letter is included as one of the 80 received.
- Various changes to the draft plan have been made in response to some of the issues raised through the consultation process.



### Policy BT3 for Adopted Local Plan

#### Adopted Teignbridge Local Plan (6th May 2014)

##### BT3 Challabrook

A site of approximately 19 hectares is allocated for mixed use development at Challabrook including:

- a) a comprehensive landscape and design led masterplan for the strategic site allocation, produced with meaningful and continued input and engagement from stakeholders including measures to mitigate and overcome flood risk;
- b) delivery of at least 1.2 hectares of land for office, general industrial or storage and distribution as appropriate to the site and its wider context, ensuring that there is a mix of unit size to enable businesses to start up and expand; support will also be given to employment generating uses provided that they are compatible with the immediate surroundings and do not conflict with town centre uses;
- c) delivery of up to 270 homes with a target of 30% affordable homes;
- d) green infrastructure and on-site open space incorporating appropriate buffering, landscaping, retention of existing trees and hedgerows and other mitigation measures to address any ecological impacts relating to greater horseshoe bats or landscape impacts relating to the site's sensitive setting adjoining Dartmoor National Park;
- e) pedestrian and cycle footpath provision to ensure permeability through the site including towards the town centre, and to local facilities on Ashburton Road; and
- f) a bespoke Greater Horseshoe Bat mitigation plan for Challabrook must be submitted to and approved before planning permission will be granted. The plan must demonstrate how the site will be developed in order to sustain an adequate area of non-developed land as a functional part of the foraging area within the SAC sustenance zone and as a part of the nearby strategic flyway used by commuting Greater Horseshoe Bats associated with the South Hams SAC. The plan must demonstrate that there will be no adverse effect on the SAC alone or in combination with other plans or projects.

Land at Challabrook Farm has been identified for a high quality mixed development to meet the long term housing, employment and educational needs of the town. A small watercourse does present some flood risk constraints, however it is considered that with careful masterplanning, flood prevention and mitigation measures incorporating open spaces and green infrastructure links, the site will yield up to 270 new homes and 1.2 hectares of employment land.

The development will need to integrate well with the rest of Bovey Tracey and the wider landscape. There must be good connectivity between the town centre, employment premises, school, sports facilities and public open space. Road access into the site could be taken from Monks Way. Appropriate road crossings will be required to ensure safe access. The sensitivity of the landscape in this part of Bovey Tracey due to its location close to the edge of Dartmoor National Park will also need to be carefully considered. The biodiversity and potential visual impact of the site will require careful consideration, including via the planting of new and retention of existing trees and hedgerows wherever possible. Challabrook Farm will also



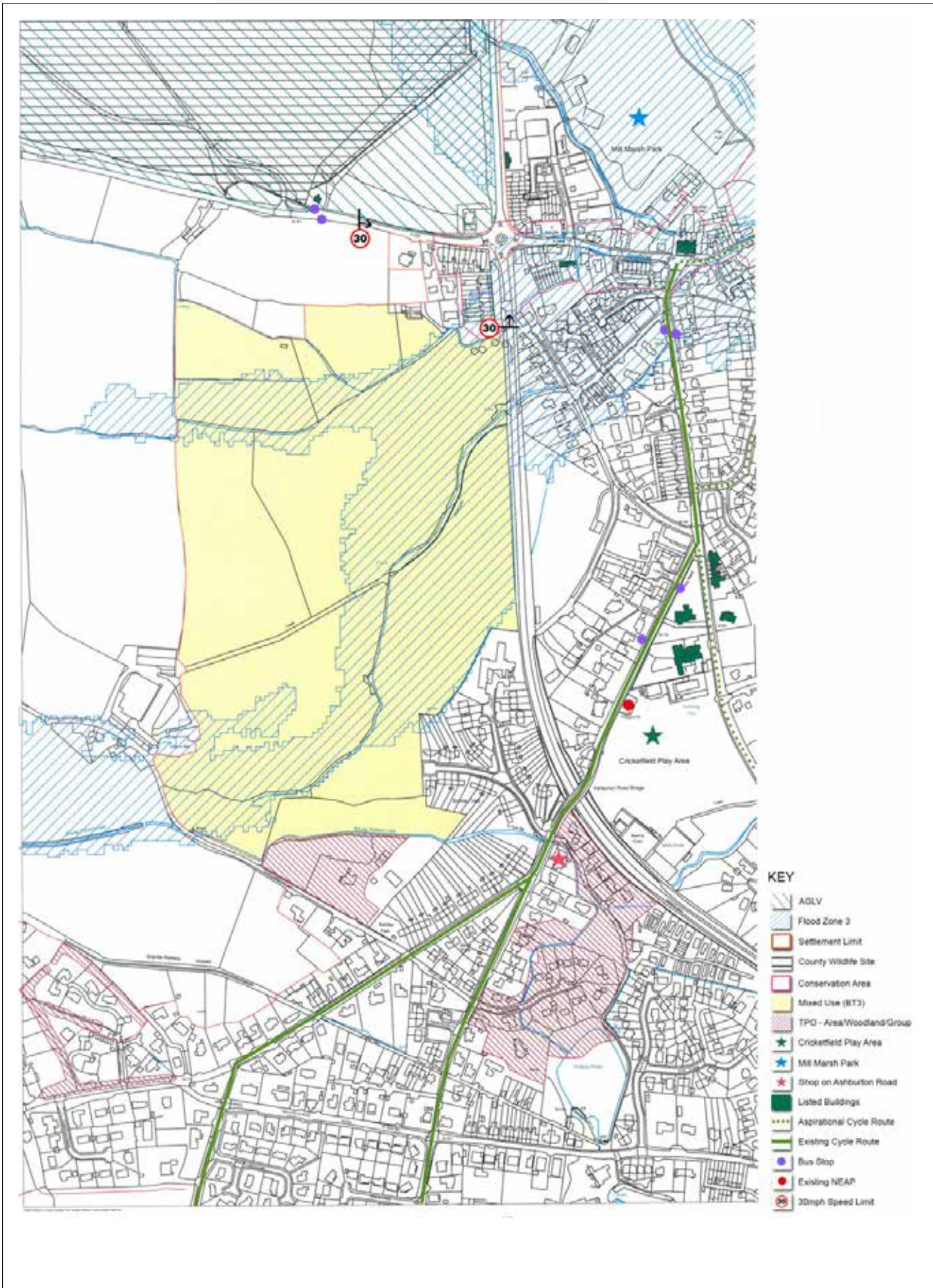
require an appropriate buffer to avoid conflict between the continued use of the farm and new development.

Due to the mix of uses and number of issues that need to be balanced it is essential that the area is planned as a whole. A masterplanning exercise will be required to inform the detailed proposals.

The west of Bovey Tracey is within the South Hams Special Area of Conservation (SAC). Therefore detailed bat survey data, along with a mitigation scheme, will need to accompany all planning applications in the area. This will need to demonstrate that the scheme protects the population of greater horseshoe bats and positively enhances any identified foraging areas. An Appropriate Assessment may be required. The masterplan and subsequent applications shall take account of recommendations within any ecological assessment.

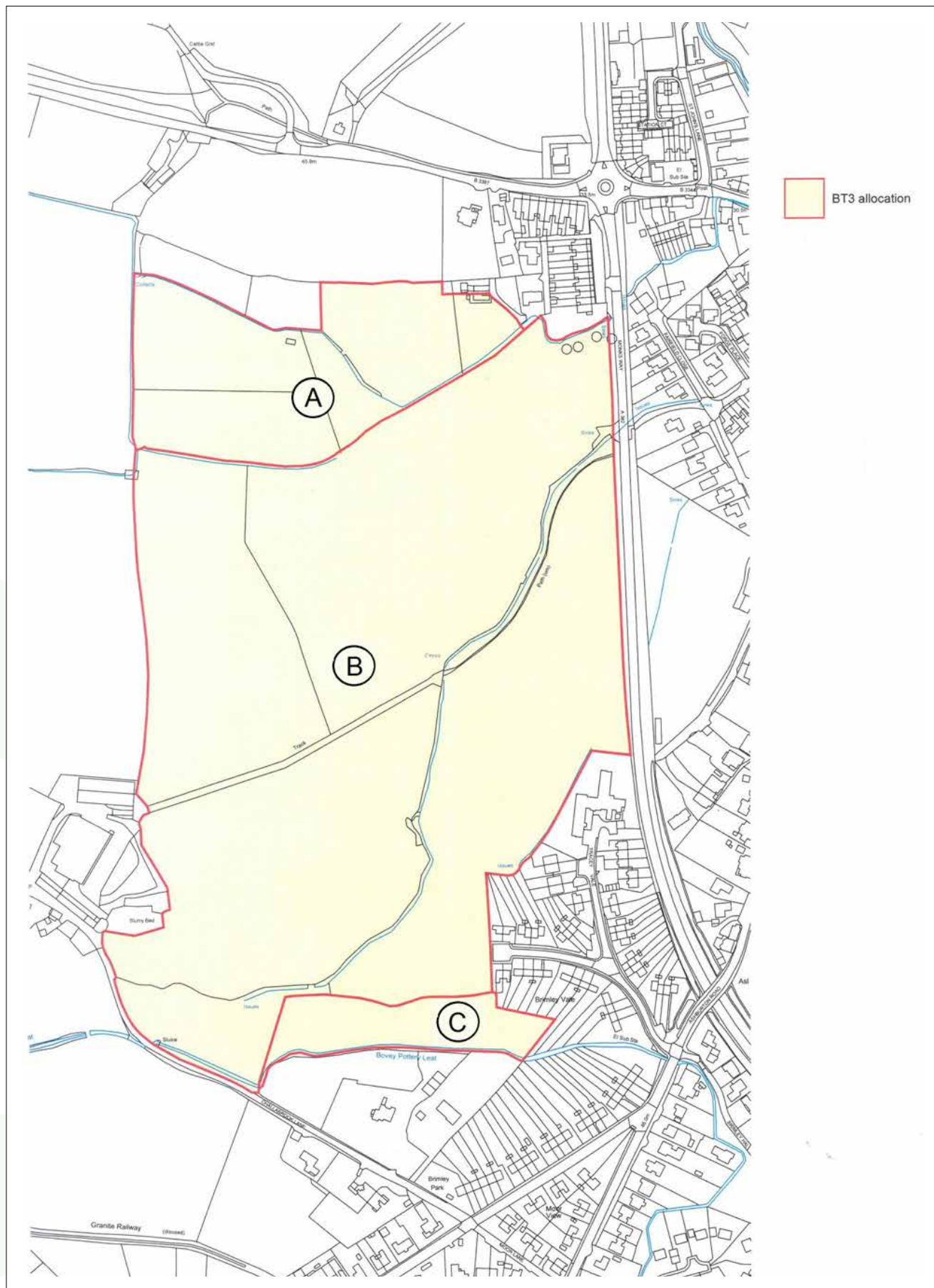
## Appendix B

## Plan 1 – Context Plan



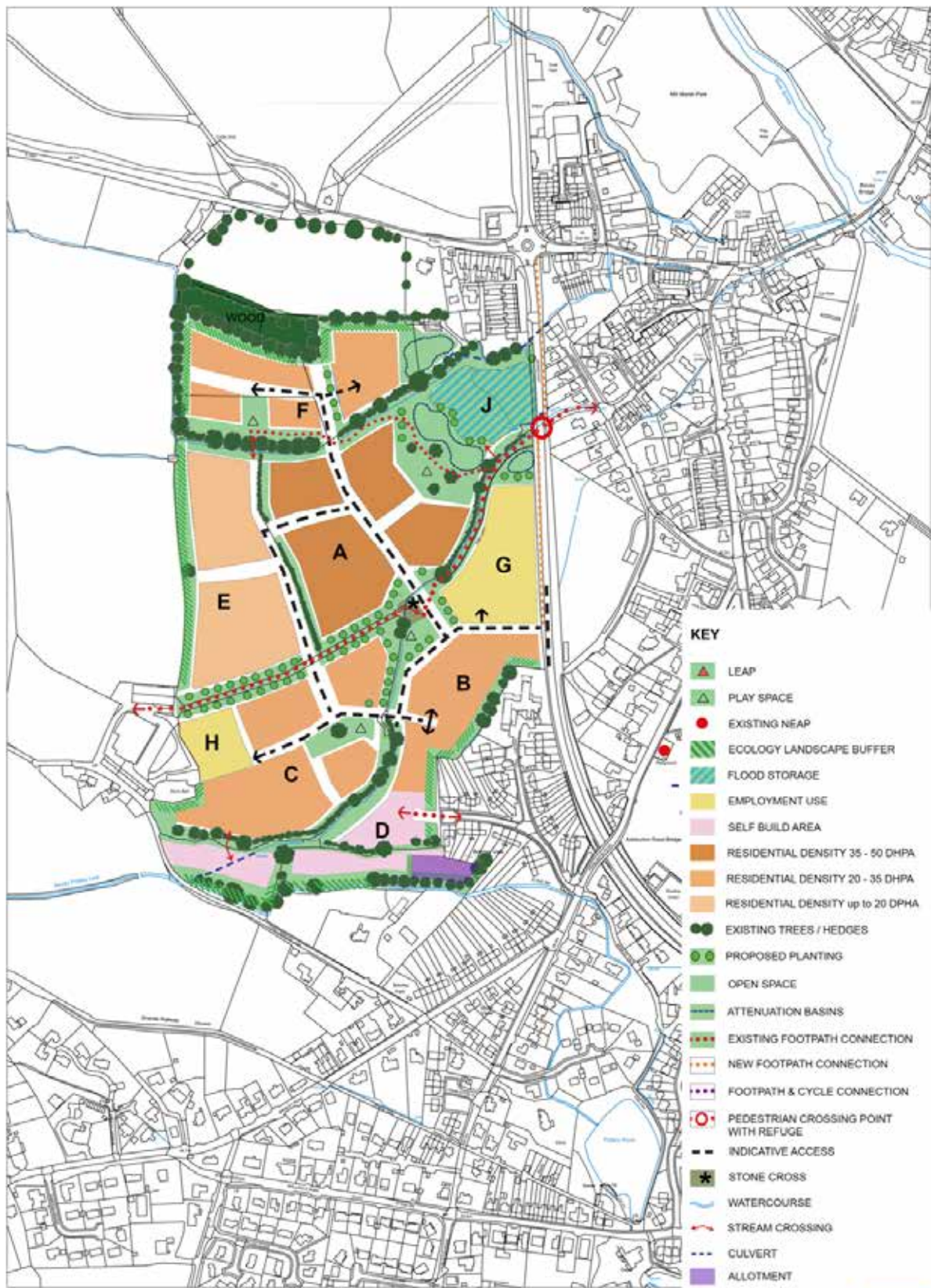


### Plan 2 – Development Areas Plan



## Appendix D

### Plan 3 – Land Use Plan

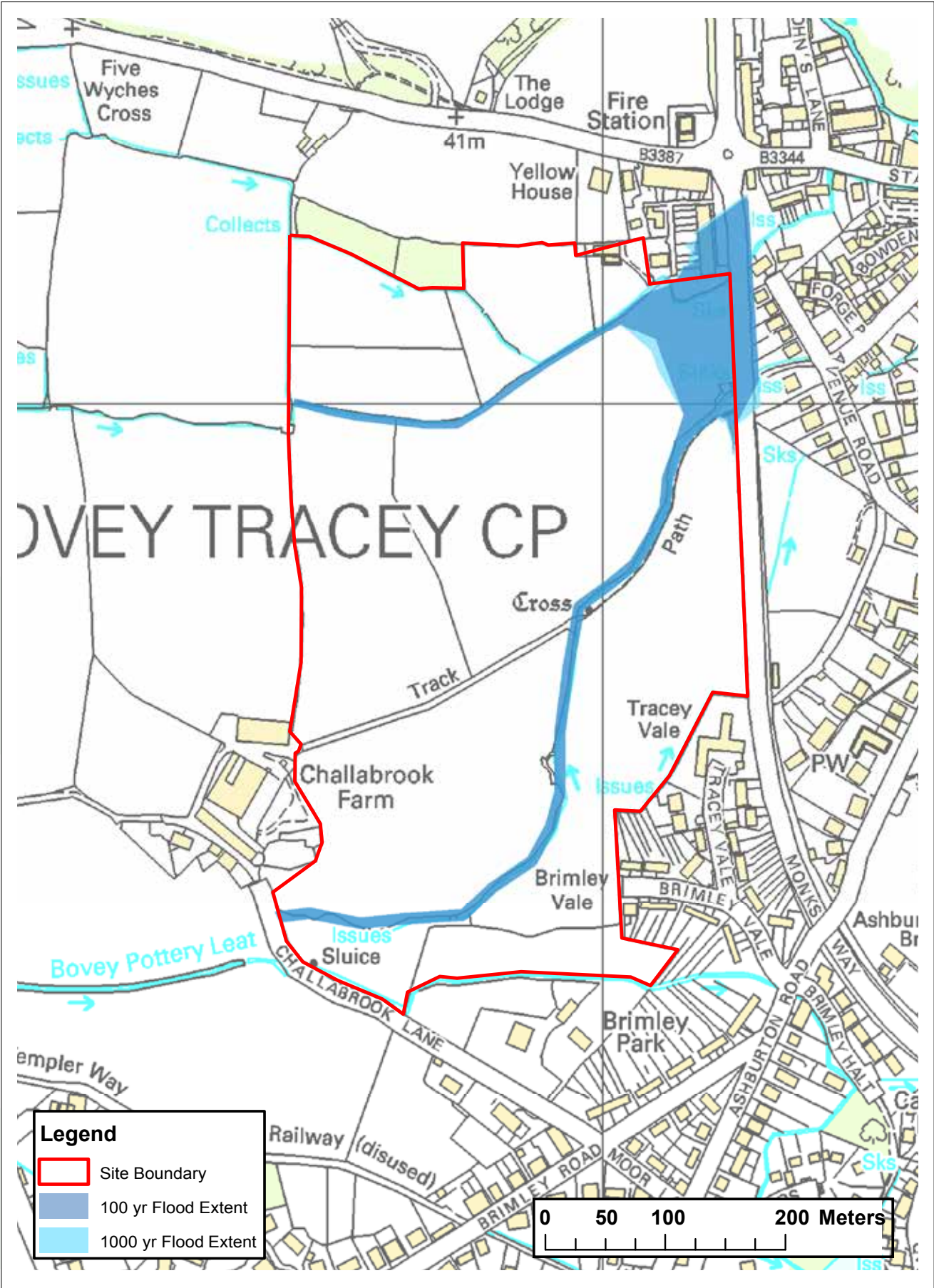


PLAN 3 LAND USE PLAN

DEVELOPMENT FRAMEWORK MASTERPLAN  
ILLUSTRATIVE LAYOUT  
N.T.S JULY 2016



Plan 4 – Challabrook Flood Model



### BT3 Challabrook - Infrastructure Delivery Plan (Infrastructure and Services)

The following infrastructure is required by the development.

The infrastructure shall be delivered by the developers of the individual sites, proportionate to the overall scale of the BT3 development.

The infrastructure is site wide and no individual element of the development shall be delivered without the proportionate delivery of the infrastructure.

Infrastructure	Description	Funding Mechanism	Lead Delivery Organisation	Timing/Phase
Vehicular access	Vehicular access from the A382 into the site and to the full extent of Development Area 1.	Developer	Developer	Phase 1
Internal roads	All vehicular roads within the site that have not yet been constructed.	Developer	Developer	Phase 2
Pedestrian crossing point with refuge on A381	Pedestrian crossing point with refuge - situated where public right of way through site crosses A381 towards Avenue Road (see Land Use Plan at Appendix D).	Developer	Developer	Phase 1
Pedestrian footway along west side of A381	Pedestrian footway along west side of A381 between vehicular access to site and public right of way/position of pedestrian crossing point (see Land Use Plan at Appendix D).	Developer	Developer	Phase 1
Pedestrian footway along east side of A381	Pedestrian footway along east side of A381 between roundabout and existing pedestrian right of way/pedestrian crossing point (see Land Use Plan at Appendix D).	Developer	Developer	Phase 1
Internal walking and cycling routes	A network of walking and cycling links (see section 3.5 "Sustainable Movement" of the DFP).	Developer	Developer	Phases 1 & 2
Formal & Informal Greenspace	The central "Village Green" area and improvements to the public right of way across the site.	Developer	Developer	Phase 1
Children's and Young People's space	Provided for in four areas throughout the site, comprising a single Local Equipped Area Play (LEAP) and three play space areas.	Developer	Developer	Phases 1 & 2
Natural Greenspace	Comprising the woodland area at the north of the site, the bat corridor at the south of the site (along Pottery Leat) and improved planted buffers along watercourses.	Developer	Developer	Phases 1 & 2
Allotments	Provision of allotments (as described in section 3.4 Green Infrastructure)	Developer	TDC	Phase 2

## BT3 Challabrook - Infrastructure Delivery Plan (Services)

Infrastructure	Description	Funding Mechanism	Lead Delivery Organisation	Timing/Phase
Primary School	Land for a replacement Primary School has been allocated at Le Molay-Littry Way as there is insufficient capacity at the existing primary school to meet local demand	Devon County Council/CIL funding	Devon County Council	n/a
Bovey Tracey Biodiversity mitigation	On-site mitigation of impact on biodiversity from development proposed at Bovey Tracey, in particular reference to Greater Horseshoe Bats	Developer	Developer	Phases 1 & 2
Gas supply	On-site provision of new pipe work connections to local gas supply.	Developer	Commercial (Wales and West Utilities)/ Developer	Phases 1 & 2
Electricity supply	On-site provision of new cables to local electricity supply.	Developer	Commercial (Western Power Distribution)/ Developer	Phases 1 & 2
Broadband	Installation of fibre optic ducting and cables to premises which are capable of providing open access telecommunications infrastructure. This will support a choice of telecommunications service providers in the market.	Developer	Telecommunication Operators/ Developer	Phases 1 & 2
Waste and potable water service provision	Pipe laying and connections to main water supply and sewage treatment works, including any improvement to the foul drainage network required by the additional demand from the development.	Developer	South West Water/ Developer	Phases 1 & 2

Habitats Regulations Assessment (HRA)

<div>HRA Screening Assessment BT3 Challabrook</div>	
	<div>M J Oxford CEcol. FIEEM.  Greenbridge Ltd  August 2016  Report for Teignbridge District Council</div>



## **HRA Screening Assessment BT3 Challabrook, Newton Abbot**

**Prepared by Greenbridge Ltd**

Date: August 2016

Version: **Final Version for Teignbridge District Council**

Recommended Citation: Oxford M. (2016) HRA Screening Assessment BT3 Challabrook

A report by Greenbridge Ltd on behalf of Teignbridge District Council.

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### **Acknowledgements**

Thanks to the Spatial Planning and Delivery Team at Teignbridge District Council for commissioning Greenbridge Ltd to undertake this piece of work to support the HRA of the Development Framework Plan.

We have drawn on a range of ecological reports and studies in the Newton Abbot area, and are grateful for the cooperation and assistance offered by staff at SLR Consulting. Thanks also to Guy Langworthy of Rule 5 Land for invaluable information provided in relation to the emerging Development Framework Plan for BT3.

This report was prepared by:

Mike Oxford M.Sc. CEcol FCIEEM

Greenbridge Ltd

## Summary

The following report, commissioned by Teignbridge District Council (TDC), provides a Habitat Regulations Screening Assessment for the local plan allocation at BT3 Challabrook.

The Screening Assessment identifies the likely effects arising from the planning proposals for BT3 (e.g. their likely effect on the integrity of South Hams SAC in relation to greater horseshoe bats), and makes recommendations, where required, for appropriate mitigation measures (commensurate with levels of information and certainty available at the Plan Making stage of the planning process).

This Assessment has also considered possible 'in combination' effects with the development proposals for BT3 and other large proposals between the northern edge of Torquay and Bovey Tracy to the north of Newton Abbot. To achieve this, the Screening Assessment has drawn upon supplementary information on 'in combination' effects commissioned by the Council and presented in:

*Greenbridge Ltd (2015) South Hams SAC Mitigation Strategy For The Heart of Teignbridge And Bovey Tracy: Mitigating 'In Combination' Effects by Protecting Landscape Connectivity Through Development 'Pinch Points'*

Through this supplementary document, the assessment and consideration of 'in combination' effects has identified that there are very few east-west routes through the landscape. In fact, when the overall extent of built up land is viewed at the landscape scale (see Map 4 of this report), what becomes apparent is the presence of an almost unbroken swathe of development (of one form or another) stretching all the way from Torbay to Dartmoor. Together in combination, these add up to extensive areas of inhospitable land and/or create far-reaching potential barriers in the landscape for greater horseshoe bats. All that remains are a number of 'pinch points' between the existing and proposed developments. At these locations the quality of habitat and/or the width of commuting routes are much reduced with few, if any, suitable alternative routes available. Recent and proposed development projects therefore constitute a significant cumulative change in the landscape and one that, without adequate mitigation, is likely to result in significant additional barriers for greater horseshoe bats to negotiate when moving through this landscape.

Section 5 of this document sets out a set of mitigation measures specifically designed to address both the effects for BT3 arising 'alone' and 'in combination'. On the basis that this proposed mitigation is adopted as part of the BT3 Development Framework Plan, and subsequently secured through appropriate planning mechanisms at such time as individual planning applications are determined, then it is concluded that the development of BT3 (as proposed) will not have a 'likely significant effect' on the South Hams Special Area of Conservation.

## 1. Introduction and Background

### 1.1 Introduction

- 1.1.1. The Draft BT3 Challabrook Development Framework Plan prepared by Rule5 Land amplifies and clarifies the requirements of Policy BT3 Challabrook of the Teignbridge Local Plan 2013. It does not replace Policy BT3 Challabrook, which remains in force as part of the statutory adopted Teignbridge Local Plan 2013-2033.
- 1.1.2. This document has been commissioned by Teignbridge District Council (TDC). It provides a Habitat Regulations Assessment (HRA) Screening Assessment of the development proposals as set out in the BT3 Challabrook Development Framework Plan. As such, it has been carried out to meet the requirements of Regulation 102 of the Habitat and Species Regulations 2010. Local planning authorities may only adopt a plan after it has been ascertained through an HRA that the plan will not adversely affect the integrity of a European site (e.g. a Special Area of Conservation).
- 1.1.3. This screening assessment identifies the likely effects arising from those proposals (e.g. their likely effect on the integrity of South Hams SAC in relation to greater horseshoe bats), and makes recommendations, where required, for appropriate mitigation measures commensurate with levels of information and certainty available at this stage of the planning process.

### 1.2 Background

- 1.2.1. The BT3 Development Framework Plan, once approved, will set out how proposals for housing, employment land, green spaces and the required infrastructure at Challabrook should be planned, delivered and phased comprehensively and in a sustainable form across the allocation as required by Policy BT3. It will be a material consideration in determining planning applications, ensuring that the overall allocation requirements, particularly in relation to planning and delivery, can be met. However, it does not preclude alternative planning proposals being considered provided these are compliant with the policy requirements of the Local Plan and which help to deliver a comprehensive scheme for BT3 Challabrook.

### 1.3 Strategic Landscape Approach to Greater Horseshoe Bat Conservation

- 1.3.1. In undertaking a screening assessment of the BT3, there has been a need to consider the conservation of a highly mobile species such as the greater horseshoe bat at the landscape scale. Consequently, screening of the area has considered how (i) the conservation status of the bats and (ii) the conservation objectives for the South Hams SAC can be applied practically at a strategic landscape level for BT3 and the surrounding area. To do this, in addition to the requirements for plan and project level Habitat Regulations Assessment (HRA), mitigation proposals have also been informed by other relevant statutory provisions.
- 1.3.2. For instance, Regulation 39 of *The Conservation of Habitats and Species Regulations* (2010) transposes the requirements of Article 10 of the EU Habitats Directive (1992) into English legislation. Regulation 39 requires development plan policies to include policies that encourage the management of features of the landscape, which are of major importance for wild flora and fauna. Article 10 states:

*“Member States shall endeavour, where they consider it necessary, in their land use planning and development policies and, in particular, with a view to improving the ecological coherence of The Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems of marking field boundaries) or their*

*function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species”.*

- 1.3.3. In response to the above, the broad principles set out in Box 1 should be applied to the formulation of all appropriate greater horseshoe bat mitigation proposals for BT3.

**Box 1 Guiding Principles for Greater Horseshoe Mitigation Measures**

- i. Maintenance of dark and unlit habitat connectivity across the wider landscape;*
- ii. Provision of adequate foraging habitat;*
- iii. Provision, where appropriate, of adequate permeability through and between areas of built development following existing and new flight paths;*
- iv. Provision of new bespoke roosts where they will provide ‘stepping stones’ across the landscape as well as maintenance of existing roosts.*

- 1.3.4. The application of these principles is considered in more detail in Section 5 of this HRA Screening Assessment for BT3.

## **2. Methodology**

### **2.1 Desk Study**

- 2.1.1. A preliminary appraisal of habitat and landscape features in and around BT3 Challabrook was undertaken with reference to relevant Ordnance Survey maps and aerial photographs. These were used to identify key topographical features associated within the area as well as prominent habitat features capable of supporting greater horseshoe bats, such as hedgerows, woodlands, water courses and grazed pasture.
- 2.1.2. Where available, further information has been gathered from a selection of ecological surveys and reports that have been prepared over the last 3 years to inform the preparation of future planning applications within BT3. Where available and in the public domain, other older records have also been referenced.

**Note:** While not in the public domain, reference has also been made to greater horseshoe bat records collected by the Devon Bat Group and held by Devon Environmental Records Centre (DERC). Although these records are not available for inclusion in this report, the data contained in these records do provide useful corroboration that greater horseshoe bats are dispersed across the wider landscape around Bovey Tracy.

- 2.1.3. This report presents a summary of the existing evidence and shows:
- Aerial Photo 1 - greater horseshoe activity recorded on site;
  - Map 2 - the location of planning applications (shown by a red dot) where greater horseshoe bats have been recorded as being present.

## 2.2 Site Visits

- 2.2.1. The following report was informed by walk over surveys undertaken in and around BT3 during March 2016 by M. Oxford (FCIEEM, CEcol) accompanied by Guy Langworthy of Rule 5 Land and Jim Wallwork of PLANeco.
- 2.2.2. The purpose of the site visit in March 2016 was to discuss the results from bat surveys undertaken during 2014 by PLANeco and to ground-truth topographic and habitat features identified through the desk studies. The visit was also used to identify habitat features within the landscape that are capable of supporting foraging and commuting greater horseshoe bats. Once identified, and in conjunction with the results of field surveys, these features have been used to establish likely flight routes and areas used for foraging within the areas in and around BT3.
- 2.2.3. A further site visit was made on the evening of the 10<sup>th</sup> July 2016, between 21.00 to 22.30hrs, to observe light conditions along the River Bovey beside Station Road Car Park, at the Recreation Ground, and also at and around the Ashburton Road bridge over Monks Way.

## 3.0 Structure of This Screening Assessment

- 3.1 A Screening Assessment is presented in Sections 5 below for BT3. The assessment is based on the desk studies, bat surveys and walk over surveys described in Section 2 above. The assessment provides information on the following:
  - a. The South Hams Special Area of Conservation (SAC) and greater horseshoe bats;
  - b. Key physical characteristics of the BT3 area;
  - c. Whether future development of the site has the potential to impact the integrity of the South Hams SAC;
  - d. Whether it is likely that potential impacts will require Habitat Regulations Assessment (HRA);
  - e. Whether it is likely that likely impacts can be mitigated effectively.
- 3.2 In addition, this assessment also considers the potential for 'in combination' effects with other development proposals that may interact adversely with the proposals for BT3.

## 4. The South Hams SAC and Greater Horseshoe Bats

### 4.1 Composition and Importance of the South Hams SAC in a European Context

- 4.1.1 The South Hams SAC has been designated for its population of Greater Horseshoe Bats. This species is identified as an Annex II species in the Habitats Directive (1992) because it is one of the rarest/most threatened animals in Europe.
- 4.1.2 The SAC holds the largest population of greater horseshoe bat in the UK, with over 1,000 adult bats (approximately 30% of the UK population). It includes both maternity and hibernation roosts, and contains the largest known maternity roost in the UK and possibly in Europe.
- 4.1.3 The SAC comprises five Sites of Special Scientific Interest (SSSIs) spread across South Devon (see Table 1). Map 1 shows the location of the five sites that make up the South Hams SAC as well as the SSSI at High Marks Barn.

**Table 1 Component Parts of the South Hams SAC** (see also Map 1)

Site Name and Relevant LPA	Description and Reasons for Notification as a SSSI	Maternity	Hibernation
<b>Berry Head to Sharkham Point SSSI and NNR</b> <i>Torbay Council</i>	Roost in caves on sea cliffs	✓	✓
<b>Buckfastleigh Caves SSSI</b> <i>Dartmoor National Park Authority</i> <i>Teignbridge District Council</i> <i>Devon County Council</i>	Roosts in inland cave complex	✓	✓
<b>Bulkamore Iron Mine SSSI</b> <i>South Hams District Council</i> <i>Devon County Council</i>	Roost in large disused mine		✓
<b>Chudleigh Caves and Woods SSSI</b> <i>Teignbridge District Council</i> <i>Devon County Council</i>	Roosts in inland cave complex.	✓	✓
<b>Haytor and Smallacombe Iron Mines SSSI</b> <i>Dartmoor National Park Authority</i> <i>Devon County Council</i>	Roosts in disused mines		✓

- 4.1.4 A sixth site has recently (2012) been designated as an SSSI as an important greater horseshoe maternity roost, although it is currently not a formal part of the designated SAC.

<b>High Marks Barn SSSI</b> <i>South Hams District Council</i> <i>Devon County Council</i>	Large agricultural barn	✓	
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- 4.1.5 Between them, these six sites support a large proportion of the total greater horseshoe bat population across South Devon; and while the High Marks Barn has not been designated as a SAC, the colony here is an integral part of the overall SAC population and must therefore be included as a consideration in any and all relevant Habitat Regulations Assessments.
- 4.1.6 The designated roost sites have been identified on the basis of their relative importance for hibernation during winter, and/or also summer roosts where whole colonies gather together and where females give birth and rear their young.



**NOTE** Buckfastleigh and High Marks Barn are secure sites, owned and managed for the benefit of greater horseshoe bats by The Vincent Wildlife Trust.

- 4.1.7 In addition to the importance of the SAC roosts, greater horseshoe bats are dependent upon the wider countryside of South Devon for the majority of their activities, including commuting, foraging, roosting, mating and seasonal migration (see Map 1).

## 4.2 Greater Horseshoe Bats: Ecology, Behaviour and Use of the South Devon Landscape

- 4.2.1 The greater horseshoe bat is one of Britain's largest and rarest bats, with a total UK population of about 5500 individuals. It should be noted that their population is not confined to the SAC sites and they are able to travel relatively large distances across the landscape and have large foraging territories.
- 4.2.2 Greater horseshoe bats are long-lived (in excess of 30 years) with the bats remaining faithful to these important roosting sites, returning year after year for generations (Natural England 2010). They feed primarily in and around woodlands, hedges and grazed pasture, especially cattle-grazed pasture. Any loss or degradation to such areas can have an impact, especially in areas close to the maternity roosts, where the juvenile bats feed. For instance conversion of pasture to amenity grassland would remove the key food source for GH bats of dung-feeding insects<sup>1</sup>. Also, the bats follow a network of 'traditional' flyways between roost sites and feeding areas and are susceptible to breaks in or removal of the features along which they commute.

## 4.3 Sustenance Zones

- 4.3.1 The *Sustenance Zones* (shown on Map 1) are considered to be of strategic importance for maintaining the population of Greater Horseshoe Bats across the South Hams SAC. These zones are based on the original work undertaken to produce Natural England's Guidance (2010) and have been identified using the best available scientific knowledge<sup>1</sup>.
- 4.3.2 For maternity roosts, the Sustenance Zones have generally been mapped using a 4km radius circle centred on each of the component SACs; as such they reflect the strategic importance of the feeding habitat around these roosts<sup>2</sup>. However, the roost at Berry Head is situated on a peninsula surrounded on three sides by the sea, so the sustenance zone here has an area approximately equal to a 4km radius circle).
- 4.3.3 In addition to the Sustenance Zones around the SAC roosts, because of the number of bats it supports, a 4km radius sustenance area has been identified around the non-SAC roost at High Marks Barn SSSI in the Avon valley (see Map 1).

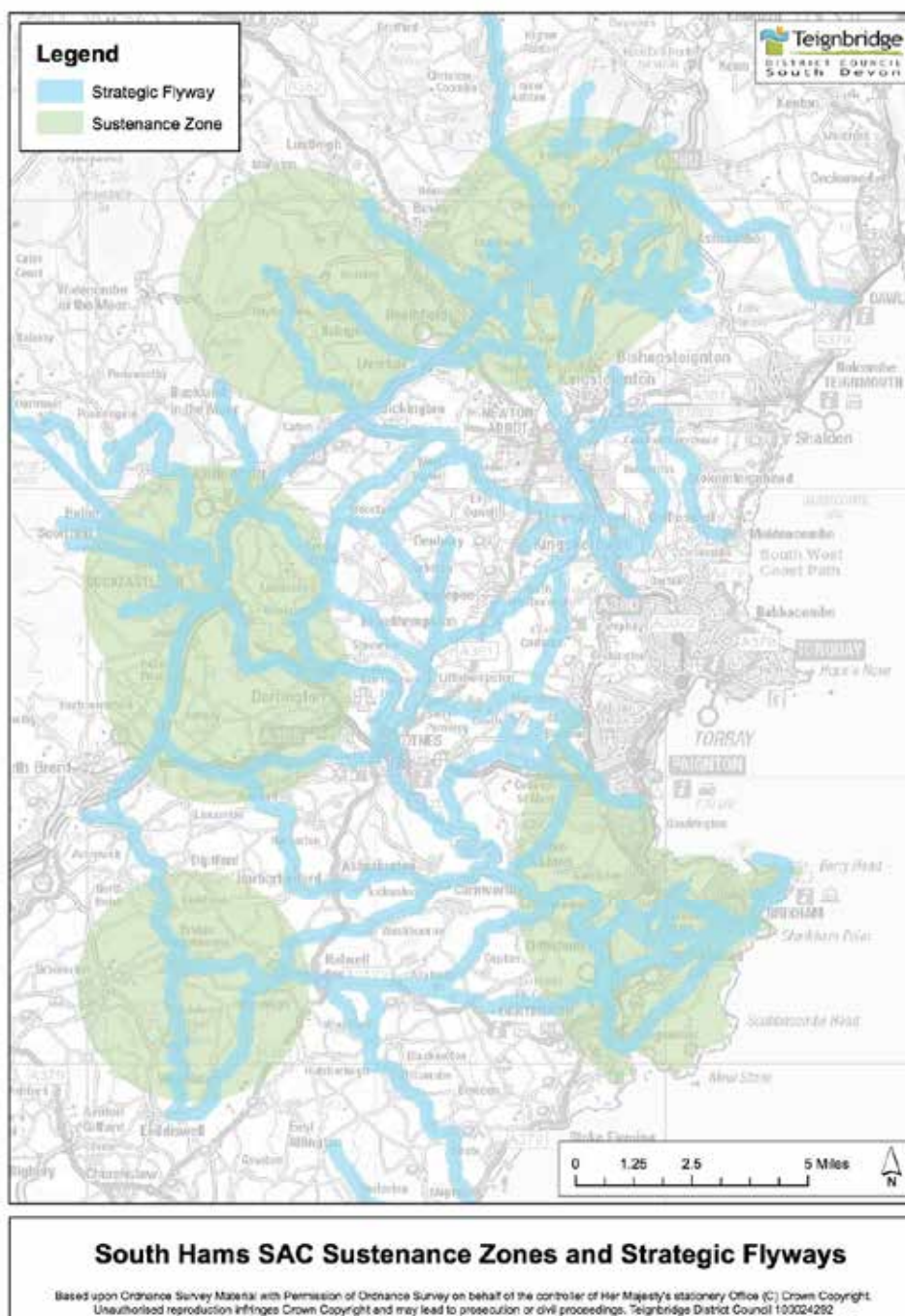
## 4.4 Strategic Flyways

- 4.4.1 Natural England (2010) have identified the *Strategic Flyways* (shown on Map 1) that are most likely to link the key (SAC) roosts and foraging habitats with the contiguous landscape features most likely to be used by greater horseshoe bats.
- 4.4.2 The *Flyways* identified are closely associated with the main rivers and sheltered valleys of

<sup>1</sup> Natural England based their 2010 guidance upon a consolidation of relevant greater horseshoe bat research and information drawn together over the previous year by Marquis & Lord Consultants. The knowledge gained through that project represents the best understanding, to date, of the dispersal patterns and key habitats of greater horseshoe bats across South Devon. In addition, based on the known distribution of greater horseshoe bats, Marquis & Lord collated spatial information to create a GIS layer that was used to inform the preparation of Map 1.

<sup>2</sup> Ransome RD and Hutson AM (2000) *Action plan for the conservation of the greater horseshoe in Europe (Rhinolophus ferrumequinum)*, Convention on the Conservation of European Wildlife and Natural Habitats, Nature and Environment No 109. <http://www.swild.ch/Rhinolophus/PlanII.pdf>  
Also see EN research reports R174 R241 R341 & R532

**Map 1 South Ham SAC, Sustenance Zones and Strategic Flyways**



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South Devon. They have been identified as being 500 metres wide to offer several pathways and provide alternative routes to accommodate variance in the weather; for example, greater horseshoe bats will prefer to travel on the leeward side of a hedgerow when conditions are adversely windy.

- 4.4.3 While the network of flyways shown on Map 1 is a current '*best estimate*' for likely routes through the landscape, other equally important routes may be identified in the course of further survey work in the future. Where this occurs, these flyways should also be subject to careful scrutiny during the consideration of any planning application, especially where their functional coherence could be at risk from proposed development.

#### 4.5 Features Required to Maintain the Integrity of the SAC

- 4.5.1 Under Regulation 61 of the *Habitat and Species Regulations* (2010) planning authorities<sup>3</sup> in South Devon cannot lawfully grant planning permission, nor under Regulation 102 can they allocate proposals in their Local Plans, unless they have established that such development proposals are not likely to have a significant adverse effect upon the integrity of the South Hams SAC. The integrity of a European site can be defined<sup>4</sup> as:

*"the coherence of its ecological structure and function, across its whole area, which enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified".*

- 4.5.2 In practical terms, this means understanding the specific requirements necessary to maintain the SAC's integrity and with it the population of greater horseshoe bats at a '*favourable conservation status*' (see Section 4.3). To achieve this, Natural England (2010) state:
- i. The area has to be large enough to provide a range of food sources capable of supporting the whole bat population; the bats feed at a number of locations through the night and will select different feeding areas through the year linked to the seasonal availability of their insect prey.
  - ii. The bats regularly travel through South Devon between their feeding sites and roosts via a network of established flyways. They also travel greater distances between the sites designated as the South Hams SAC at certain times of the year, for example: in the spring and autumn between hibernacula and maternity sites, and in the autumn to mating sites.
  - iii. To move between their roosts and foraging areas, the bats require linear features in the landscape to provide landscape permeability. Compared to most other bat species, the echolocation call of the greater horseshoe bat diminishes (attenuates) rapidly in air due to its relatively high frequency. This means it cannot 'see' a great distance and is one reason why it tends to use landscape features to navigate, such as lines of vegetation (e.g. hedgerows, woodland edge, vegetated watercourses etc). The greater horseshoe bat will tend to fly close to the ground (up to a height of 2m), and mostly beneath vegetation cover. Radio tracking studies<sup>5</sup> and observations in the field confirm that greater horseshoe bats will regularly use the interconnected flyways associated with lines of vegetation. Further studies<sup>6</sup> have shown that landscapes with broadleaved woodland and watercourses are important as they provide habitat continuity.

<sup>3</sup> The competent authority is most likely to be the planning authority for planning applications, but for other types of consent may be another regulatory body (e.g. the Environment Agency) or infrastructure provider (such as the Highways Authority).

<sup>4</sup> See Chartered Institute of Ecology and Environment <http://www.cieem.net/glossary>

<sup>5</sup> Radio tracking studies of greater horseshoe bats have been commissioned by Natural England as described in the following research reports R344, R496 & R573.

<sup>6</sup> A L Walsh & S Harris, (1996), Foraging habitat preferences of vespertilionid bats in Britain. *Journal of Applied Ecology*, 33, 508–518.

- iv. This species is sensitive to light and will avoid lit areas<sup>7</sup>. The interruption of a flyway by light disturbance, as with physical removal/ obstruction, would force greater horseshoes to find an alternative route which is likely to incur an additional energetic burden and will therefore be a threat to the viability of the bat colony. In some circumstances, alternatives will not be available, leading to isolation and fragmentation of the bat population from key foraging areas and/or roosts.
- v. There must be a sufficient number and range of different types of roosts throughout the landscape to support the population through all stages of the bats' daily and seasonal life cycle.
- vi. Roost exits must be shielded from any artificial lighting, and suitable cover should be present to provide darkened flyways to assist safe access to and from the wider habitat<sup>8</sup>.
- vii. The feeding and foraging requirements of this species have been well studied in Devon and in the UK<sup>9</sup>. Most feeding activity is concentrated in an area within 4km of the roost (juvenile bats will forage within 3km at a stage in their life when they are most susceptible to mortality). The most important types of habitat for feeding have been shown to be permanent pasture grazed by cattle, broad-leaved woodland, hay meadows and wetland features such as streamlines and wet woodland. Pastures and meadows are particularly well used where they are surrounded by well-developed field boundaries.
- viii. Depending upon the availability of suitable flyways and feeding opportunities, most urban areas will provide limited greater horseshoe bat habitat. This is particularly true of dense urban areas with a high incidence of night lighting and lack of unlit green spaces.

#### 4.6 The Contribution of Other Satellite Roosts to The Integrity of the SAC

- 4.6.1 Conservation efforts for greater horseshoe bats have traditionally focused on maternity and hibernation sites. However, it is increasingly apparent that other roosts play a vital role during the annual cycle of the species. For example, on emergence from hibernation, many bats do not go directly to maternity sites. Indeed, there may be a gap of several weeks between the majority of bats leaving the known hibernation sites and the date of their arrival in corresponding numbers to maternity roosts. During this period, it is presumed that the animals must be using smaller '**formation**' roosts, and much of pregnancy may occur whilst the females occupy such sites<sup>10</sup>. Similarly, later in the summer, there are examples of sites being used by large numbers of adult female and juvenile bats (**post-breeding sites**), with the bats only arriving after the maternity period. It is not known whether such sites occur within the South Hams SAC, but precedents are known elsewhere (e.g. Iford Manor in NE Somerset which is recognised as an integral part of the Bath and Bradford on Avon Greater Horseshoe Bat SAC).
- 4.6.2 **Mating sites** are critical for the survival of the species and have been shown to be the main predictor of adult survival and reproductive success<sup>11</sup>. This is because gene flow occurs almost

<sup>7</sup> <http://www.batsandlighting.co.uk>

<sup>8</sup> See English Nature research report R174

<sup>9</sup> R D Ransome and A M Hutson, (2000), Action plan for the conservation of the greater horseshoe in Europe (*Rhinolophus ferrumequinum*), Convention on the Conservation of European Wildlife and Natural Habitats, Nature and Environment No 109. <http://www.swild.ch/Rhinolophus/PlanII.pdf>  
Also see EN research reports R174 R241 R341 & R532.

<sup>10</sup> Ransome R & Hutson AM (2000) *Action plan for the conservation of the greater horseshoe bat in Europe* (*Rhinolophus ferrumequinum*) (Council of Europe).

<sup>11</sup> Rossiter SJ, Jones G, Ransome RD, & Barratt EM (2001) Outbreeding increases offspring survival in wild greater horseshoe bats (*Rhinolophus ferrumequinum*). *Proceedings of the Royal Society of London. Series B: Biological Sciences* 268(1471):1055-1061.

exclusively due to mixing at mating sites<sup>12</sup>. These sites are often small, are occupied by a territorial male (occasionally two males if the site is subdivided). The males may be present from spring until autumn, and may even stay throughout the winter. In late summer and autumn, groups of related females visit these sites to mate<sup>9&13</sup>. Often, even at this time, fewer than 7 bats are usually present at any given time. However, ringing records show that over the course of the mating season, large numbers of females can pass through the sites, often visiting a series of males (Mathews, *pers obs.*). Genetic analysis has shown that females are likely to mate with the same male in a series of years. Whilst one male can mate with multiple females whereas others may achieve no reproductive success, it is clear that a population of several thousand bats, as found in the South Hams, will require many mating sites (each containing a single male) in order to maintain genetic diversity.

4.6.3 In summary, attention must be paid to the protection of 'satellite' roosts because each can be fundamental to the survival of the population. They are often harder to identify than hibernation or maternity sites for two reasons. First, they may be used for a shorter period (particularly 'formation roosts'), and therefore particular attention must be paid to identifying signs of bats as well as the bats themselves. Secondly, there is a danger that mating sites may be dismissed as unimportant because only small numbers of animals are present simultaneously. It is notable that only a handful of mating sites are known in Devon. Identifying and protecting others is a priority if the genetic diversity of the population is to be maintained. These 'satellite' roosts may be found in caves, buildings and structures scattered across the landscape, and outside of the *Sustenance Zones* and *Strategic Flyways*.

4.6.4 There is also growing evidence that horseshoe bats utilise **night roosts** to rest up, groom, eat and digest their prey and to use as a base to be able to extend foraging over a longer distance. In a study of lesser horseshoe bats, Knight and Jones (2009) highlight that little emphasis has been placed on the conservation importance of night roosts, although they may act as refuges close to foraging grounds. They identified that 75% of the bats used night roosts away from the maternity roost, typically in buildings. Since these night roosts were significantly nearer to core foraging areas than maternity roosts, Knight and Jones recommend that they should be considered as an integral part of those core foraging areas. They suggest that minimisation of distance to feeding sites may be the primary function of the night roosts, which are used for resting and digestion between feeding bouts, with a secondary use for communal behaviour<sup>14</sup>.

## 4.7 Prey Species and Foraging Behaviour

4.7.1 Greater horseshoe bat prey items change throughout the summer with breeding females depending on Scarab beetles from April to June, Dor-beetles (*Geotrupes*) in April, and Cockchafer *Melolontha* in May and June) and moths (particularly *noctuid* moths) from June onwards. Key prey items for juveniles are the Dung beetles (*Aphodius rufipes*) associated with cattle pastures and considered important because they reach peak numbers at the time juveniles begin to feed (Ransome; 1996).

4.7.2 Although adult greater horseshoe forage over long distances, juvenile bats stay within 1km of their maternity roost in July and August whilst they are learning to forage and therefore the presence of cattle pasture near to their roost is important (Ransome, 1996). Crane flies (*Tipula*) are eaten from late August to September as the bats fatten up prior to hibernation (English Nature; 2003). Hibernation is temperature dependent but generally occurs between late November and early March.

<sup>12</sup> Rossiter S.J, Jones G, Ransome RD, & Barratt EM (2000) Parentage, reproductive success and breeding behaviour in The greater horseshoe bat (*Rhinolophus ferrumequinum*). *Proceedings of the Royal Society of London. Series B: Biological Sciences* 267(1443):545-551.

<sup>13</sup> Rossiter SJ, Ransome RD, Faulkes CG, Le Comber SC, & Jones G (2005) Mate fidelity and intra-lineage polygyny in greater horseshoe bats. *Nature* 437(7057):408-411.

<sup>14</sup> Rossiter *et al.* (2002) found that female bats and their daughters often share night roosts, sometimes over several years, and no cases were recorded of non-relatives using the same night roost. Night roosts may therefore be important centres for information transfer among relatives, and Rossiter *et al.* recommend that this should be considered in conservation.



## 4.8 Changes in the Landscape and Potential Impacts on Site Integrity

- 4.8.1 Taking all of the above requirements into account, greater horseshoe bats are particularly susceptible to the following changes in their habitat that may arise as a result of development:
- Impact on roost sites (including damage, destruction, disturbance and prevention of access);
  - Removal, severance, obstruction or disturbance of linear features used for navigation and commuting;
  - Change in habitat structure and composition (e.g. loss or change in quality, quantity and distribution of foraging habitat);
  - Disturbance from new illumination causing bats to change their use of an area;
  - Physical injury by wind turbines and / or displacement from foraging or commuting habitat by wind turbines
  - Barrier effects across the landscape caused by new roads and increased risk of collision between bats and vehicles.
- 4.8.2 These effects are likely to be most significant, but not exclusively, in the *Strategic Flyways* and *Sustenance Zones* (see Map 1)<sup>15</sup>.
- 4.8.3 While there are odd exceptions, greater horseshoe bats are extremely sensitive to increased light levels and will typically avoid areas where the lighting is brighter than 'moonlight' (typically recorded as being between 0.27 and 1lux)<sup>16</sup>. Thus house lights, road lights, vehicle lights, security lighting and floodlighting may all have an adverse effect. For instance, one poorly positioned light can stop bats using a crucial flyway or an area of feeding habitat. Unusual levels and pitches of noise can also cause disturbance.

## 5. HRA Screening Assessment

### 5.1 Key Characteristics of BT3 Challabrook and Use by Greater Horseshoe Bats

- 5.1.1. BT3 is comprised of a greenfield site immediately to the west of the existing settlement of Bovey Tracy. The area is characterised by a number of large fields under pasture and the land slopes very gently from high ground in the west down towards Monks Way (the A382).
- 5.1.2. BT3 lies within the intersection of *Sustenance Zones* for two South Hams SAC roosts. The closest being centred on the Haytor and Smallacombe Mines *Site of Special Scientific Interest* at c.3.5km to the west of BT3 and the other at Chudleigh *Site of Special Scientific Interest* approximately 5.5km to the east. There are also a number of other smaller greater horseshoe roosts within easy commuting distance of BT3 (see Map 2).
- 5.1.3. Of the local greater horseshoe roosts identified around Bovey Tracy, the most important is a record in 2009 of a breeding colony of approximately 30 bats at Colehayes Park Field Studies Centre; this is c.1.5km to the west of BT3. The current status of this roost is being investigated during the summer of 2016<sup>17</sup> and if still in use as a breeding site it means that BT3 is within only a few minutes flying time for adult horseshoe bats from this roost and is only just beyond the normal range of juveniles when they first begin foraging in July and August. The records from 2009 also demonstrate that there is suitable habitat capable of sustaining a viable local

<sup>15</sup> Based on the South Hams SAC Planning Guidance prepared by Natural England (2010).

<sup>16</sup> Schlyter, Paul (1997–2009). Radiometry and photometry in astronomy. Archived from the original on 2013-12-07 and Bunning, Erwin; Moser, Ilse (April 1969). Interference of moonlight with the photoperiodic measurement of time by plants, and their adaptive reactive. *Proceedings of the National Academy of Sciences of the United States of America* **62** (4): 1018–1022.

<sup>17</sup> The roost at Colehayes is being investigated by Devon Greater Horseshoe Bat Project.



population of greater horseshoe bats west of Bovey Tracy, sufficient for them to breed and rear young.

- 5.1.4. BT3 lies outside of but between two SAC *Strategic Flyways* (see Map 1). One of these follows the River Bovey through Bovey Tracy to the east and the other follows the valley of the Liverton Brook to the west.
- 5.1.5. For the purpose of this HRA Screening Assessment, BT3 is a composite allocation made up of a four land parcels; these are shown on Aerial Photo 2 of this report. Each are identified separately by a capital letter (e.g. 'A', 'B', 'C' etc.) and their key characteristics and interest for GHBs are described in turn below. In addition, an adjacent fifth area ('E') is also described in the context of how it may support the movement of greater horseshoe bats through BT3.
- 5.1.6. **Area 'I'** forms the northern compartment of BT3 and is comprised of one relatively large area of grassland and a small block of deciduous woodland along the northern margin. The grassland is sub-divided by wire fences into four smaller units. The entire area is bounded on the western and southern edge by tall mature hedgerows and tall trees and the short eastern boundary backs onto terraced residential properties along Monks Way.
- 5.1.7. Area 'I' slopes very gently towards the east and a ditch runs along the southern boundary draining towards the River Bovey. The field appears to be cattle/stock grazed and as such represents sheltered and near optimal foraging habitat for greater horseshoe bats.
- 5.1.8. **Area 'II'** is an irregular shape and lies in the middle of BT3. It is formed of two large pasture fields. The northern boundary is marked by a tall mature hedgerow and trees shared with Area 'I'. In contrast, the western boundary is formed by a hedgerow that is square in cross-section and heavily managed. A hedgerow also runs approximately north-south from the northern boundary, but stops at a public footpath that dissects Areas 'II' on a north-east to south-west alignment; a wire fences run along either side of the footpath. A watercourse, a mature hedgerow and tall trees form the eastern boundary. A small number of mature trees are also dotted throughout the north-eastern corner of Area 'II'.
- 5.1.9. **Area 'III'** is comprised of another very irregularly shaped compartment formed from one field. Along its western boundary it shares a watercourse, hedgerow and tall trees with Area 'B'. The northern section of the eastern boundary is formed by a intensively managed hedgerow that runs along the road known as Monks Way (A382), while southern section of this boundary backs onto residential properties accessible via two cul-de-sacs: Tracy Vale and Brimley Vale. The southern boundary of Area 'III' is shared with Area 'IV' and is comprised of mature hedgerows and tall trees. Area 'III' is appears to be cattle grazed for much of the year.
- 5.1.10. **Area 'IV'** is formed of two long narrow fields that run in an east-west direction. These vary in width from being c.60m at their widest to c.25m at the narrowest point. A short section of hedgerow divides the two fields, a wire fence along Challabrook Lane marks the western boundary of the western field, and mature hedgerows with lines of trees run along the northern and southern boundary of both fields. The Bovey Pottery Leat runs into Area 'D' from the west of BT3 (see Aerial Photo 3) and flows along the inside of the southern edge of this area.
- 5.1.11. Area 'IV' forms a sheltered corridor for commuting and foraging greater horseshoe bats and is part of an unbroken link of substantial linear features (e.g. mature hedgerows and woodland edge) that extend westward from BT3 all the way to the maternity roost at Colehayes Field Studies Centre (see Aerial Photo 3). To the east, this corridor becomes narrower but continues into Area 'V'.
- 5.1.12. The land parcel shown as **Area 'V'** on Aerial Photo 2 is not within the BT3 Local Plan allocation. However, the Bovey Pottery Leat continues eastward through this area and – as a linear landscape feature of value to commuting bats – the Leat is further augmented and enhanced by

a line of mature trees that run along its length up to the junction of Brimley Vale and Ashburton Road.

- 5.1.13. The residential properties either side of Area 'V' all have gardens up to 30-40m long, providing a significant set back from the houses along most of the boundary with Area 'V'. However, at the narrowest point, at the eastern end of Area 'V', this tree-lined corridor passes between two properties and is reduced to c.25m in width; this represents a significant '*pinch point*' near the road junction between Brimley Vale and Brimley Halt.
- 5.1.14. In the context of this HRA Screening Assessment, Area 'V' is notable because it forms a habitat connection and potential corridor through the existing housing that lies to the north and south. As such, Area 'V' represents one of the few green, unlit, sheltered and relatively safe routes for greater horseshoe bats to pass through the wider areas of built settlement in and around Bovey Tracy. Indeed, it is one of the few such green links through the extensive areas of built development between the A38 and the northern edge of Bovey Tracy (see Aerial Photo 4).
- 5.1.15. Furthermore, Areas 'IV' and 'V' must be considered to be on a strategic east-west alignment, where they sit on an almost straight line between the SAC roosts at Chudleigh and Haytor and the records of a maternity roost at Colehayes. The overall value of this particular route alignment to the integrity of the SAC, facilitating as it does the opportunity for movement between these three roost locations, should therefore not be underestimated.

## 5.2 Use of BT3 by Greater Horseshoe Bats

- 5.2.1. BT3 provides mixed opportunities for greater horseshoe bats, with some areas providing near-optimal foraging and commuting habitat (e.g. permanent grazed pasture with tall bushy hedgerows), whereas other areas are less hospitable (e.g. large open fields with little shelter provided by intensively managed hedges).
- 5.2.2. The bat surveys undertaken by PLANeco (2015) have confirmed that greater horseshoes are present in relatively low numbers and can be found commuting and/or foraging across parts of BT3. A summary of the activity recorded by PLANeco is presented on Aerial Photo 1.
- 5.2.3. While the numbers at any one survey location may be relatively low, compared to other common species (e.g. common pipistrelle), it must be born in mind that greater horseshoe bats are afforded special protection under Annex II of the EU Habitats Directive (1992) because of their rarity. It therefore follows that they are more difficult to detect and that their numbers are very likely to be low and dispersed across a wide landscape – as indicated on Map 2.
- 5.2.4. Work undertaken to inform this HRA Screening Assessment has assembled evidence<sup>18</sup> indicating widespread greater horseshoe bat activity across the landscape around Bovey Tracy (see Map 2). And while these records are dispersed, and the exact abundance and distribution of these 'local' greater horseshoe bats is often unclear, it is well established that the bats roost, forage and commute widely across this landscape - and notably around and through BT3.

## 5.3 BT3 in a Landscape Context for Greater Horseshoe Bats

- 5.3.1. Seen at the landscape scale, there are only limited opportunities for greater horseshoe bats to move through or around the more densely built up areas of Bovey Tracy. In particular, strong habitat linkage between the *Strategic Flyway* along the River Bovey in the east and the roosts on the western side of the town is likely to be restricted to just a few locations. Corridors at

<sup>18</sup> The latest evidence for BT3 Challabrook is based on recent surveys that have been undertaken to inform imminent planning applications, and upon more historic records associated with planning applications submitted in the past 5-10 years (details of these are shown on Map 2).

these locations are all very different in character and are shown on Aerial Photo 3 and described in turn below:

- 5.3.2. **River Bovey Corridor** - To the north of the town, greater horseshoe bats are known to fly along the River Bovey corridor (this is within the Strategic Flyway identified by Natural England). This is a confirmed commuting route<sup>19</sup> through the town, although the bats appear greatly restricted along a 30-40m section of the river where they must make use of a narrow (c.10m wide) stone-lined channel as it passes between Station Road car park and the old water mill (now occupied by the Devon Guild of Craftsmen galleries) before passing under the double stone arch of Bovey Bridge on Station Road. The west bank of the channel is however overshadowed by mature Ash and Lime trees that create significant shade along the river offering ample buffering against the lights in the car park and providing dark conditions for horseshoe bats to traverse through this section of the town.
- 5.3.3. Furthermore, Mill Marsh Park to the north and open pastoral farmland to the south provide an undeveloped and unlit landscape for the bats on either end of this pinch point. These open areas provide near optimal commuting habitat for the bats and must surely act as an encouragement for bats to continue using the short and less than optimal section of the river by the Bovey Bridge.
- 5.3.4. **Corridor Through Land at North End of Old Newton Road** - To the south of the town, land grassland at the north end of Old Newton Road (i.e. BT2C local plan allocation) currently provides an undeveloped open east-west landscape link. This land is unlit and is comprised of grassland and woodland and would provide unrestricted access for bats flying through this area.
- 5.3.5. However, it appears from maps and aerial photographs that this area is the only gap in what is otherwise an uninterrupted line of built development from this point to the A38 which is 1.75 km to the south. Between the north end of Old Newton Road and the A38 are the business units of the Heathfield Industrial Estate and the residential area of Heathfield south of Battle Road. All of the industrial premises on the Heathfield Industrial Estate are externally lit in some form.
- 5.3.6. **Corridor Along the Bovey Pottery Leat** – The identification of an east-west commuting route through the central part of the Bovey Tracy (e.g. between Station Road and Pottery Road) is more difficult to identify due to extensive areas of built development and the line of Monks Way (A382) running north-south. However, there is a strong case to be made for a likely commuting route for horseshoe bats along the line of the Bovey Pottery Leat that runs along the southern boundary of BT3. To the east of Monks Way, bats would have unrestricted access at night around the margins of the Recreation Ground south of the Parish Church of St John the Evangelist (see Aerial Photo 4). And further east beyond these sports pitches, there is near-optimal commuting and foraging habitat for the bats in the form of woodland, permanent pastures, standing water (Indio Pond) and various watercourses along the valley of the River Bovey.
- 5.3.7. The Leat is clearly visible on Aerial Photo 3 because it runs adjacent to a prominent tree-lined mature hedgerow. As can be seen on Map 3 it flows eastward from near Colehayes Park and runs to Ashburton Road where it swings south towards Pottery Pond just north of Pottery Road. Just south of Ashburton Road, the Leat is joined from the east by another watercourse that flows along the southern edge of the Recreation Ground from Indigo Pond on the other side of Newton Road. This means that historically, prior to the construction of Monks Way, there would have been a strong linear connection for bats through this part of the landscape formed by these two watercourses. Since greater horseshoe bats are known to be faithful to historic routes, and because near-optimal habitat connectivity exists either side of Monks Way, this alignment continues to offer a likely route through this part of Bovey Tracy.

<sup>19</sup> Kestrel Wildlife Ltd undertook work to inform the evidence submitted to the Local Plan Enquiry in Public (2014); this was done using static detectors to confirm that greater horseshoe bats were using the River Bovey through the town.

- 5.3.8. However, this route passes through a pinch point (see Aerial Photo 4) formed by residential properties at the end of Brimley Vale and where the Ashburton Road passes across a bridge over Monks Way. The pinch point is approximately 50m in length and passes between two residential properties that are 25m apart. Unsympathetic street lighting around the junction of Brimley Vale and Ashburton Road present a further potential barrier to bat movement through this area, but relatively dark routes are present especially on the northern side of the approach to the bridge over Monks Way through Area 'E'<sup>20</sup>.

**Map 3 Landscape Context for Bovey Pottery Leat**

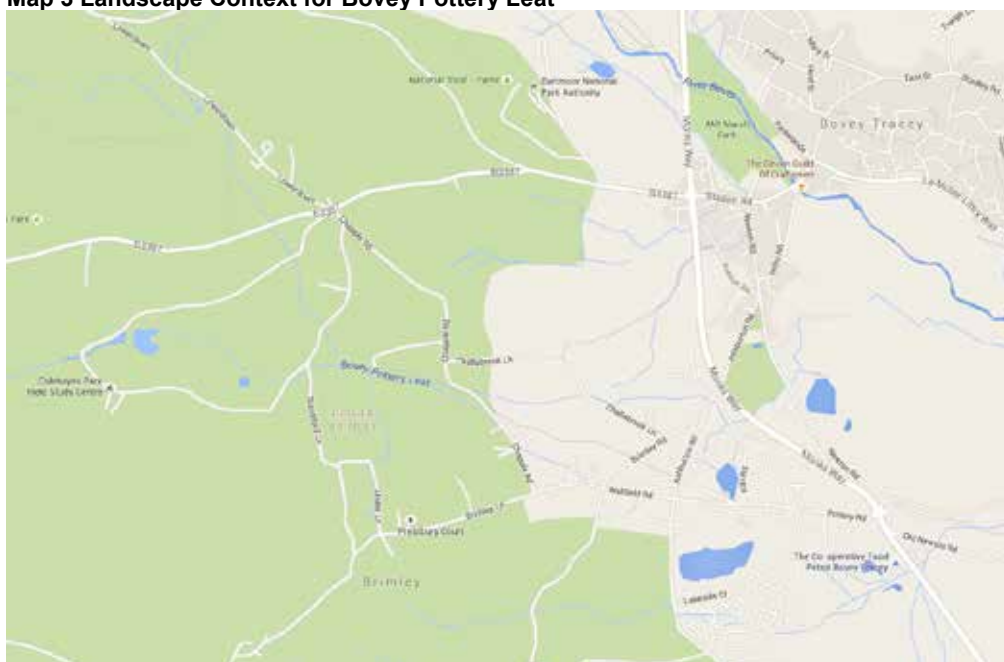


Image: Google Earth

**Aerial Photo 4 Pinch Point Centred on Monks Way and Ashburton Road**



Image: Google Earth

<sup>20</sup> Light conditions around this pinch point were observed at dusk on the evening of 10th July 2016 (21.00 to 22.30hrs)

5.3.9. There is a strong case to be made to retain and if possible enhance this east-west alignment because it hopefully provides important permeability and potential linkage between the River Bovey *Strategic Flyway* and important habitat features for greater horseshoe bats to the west of both the town and BT3; these being:

- (a) optimal foraging habitat across extensive areas of permanent pasture extending right across to the lower slopes of Dartmoor around the Hay Tor and Smallacombe Mine SAC roosts, and;
- (b) the reported greater horseshoe maternity roost at Colehayes Field Studies Centre.

#### **5.4 Does Future Development of BT3 Challabrook Have the Potential to Impact the Integrity of the South Hams SAC?**

5.4.1. In order to meet the *Conservation Objectives* set by Natural England for the South Hams SAC, and to maintain population levels at 'Favourable Conservation Status' (see Appendix B.1 and B.2), it is important that existing habitat connectivity across the landscape is retained, and wherever possible enhanced. This is necessary to maintain the current range and distribution of greater horseshoe bats in the landscape

5.4.2. A number of landscape features within BT3 offer suitable (or even optimal) foraging and commuting habitat for greater horseshoe bats:

- Long narrow cattle grazed fields and boundary hedgerows in Area 'IV';
- Grazed pasture in Area 'I'
- Hedgerow habitat along the boundary between of Areas 'I' and 'II';
- Hedgerow habitat either side of the watercourse running along the boundary between of Areas 'II' and 'III'.

5.4.3. PLANeco (2014) commissioned by the site promoter at BT3 have recorded relatively low levels of greater horseshoe activity around Challabrook. However, in light of the horseshoe activity across the surrounding landscape, development in an inappropriate location and/or of an inappropriate design does have the potential to disrupt or sever identified and suspected key landscape linkages (see sections 5.1.23 and 5.1.24 above). Such disruption could adversely affect the ability of this species to continue to move between and use extensive areas of the landscape between the SAC roosts (see Map 1), and thereby be likely to impact on the integrity of the of the South Hams SAC. Likely (i.e. potential) impacts that may arise from development proposals for BT3 are set out in Table 1 below.

#### **5.5 Is it Likely That Potential Impacts Will Require Habitat Regulations Assessment (HRA)?**

5.5.1. Consistent with the precautionary principle, and where proposed development is likely to lead to some or all of the impacts described in Table 1, an HRA Screening Assessment is required to determine whether there is a 'likely significant effect' on the SAC.

5.5.2. It will only be possible to avoid full Appropriate Assessment if detailed mitigation measures are incorporated fully into the development proposals that clearly demonstrate that there will be no likely significant adverse effect on the integrity of the South Hams SAC.

5.5.3. In order to meet the requirements of the HRA process, decisions by Teignbridge District Council, over future planning applications for development within BT3 Challabrook, will need to be informed by:

- Adequate bat surveys (consistent with the 2<sup>nd</sup> Edition of the South Hams SAC Guidance 2016<sup>21</sup>);

<sup>21</sup> SAC Guidance currently in preparation as of August 2016.



- Accompanying ecological impact assessments (EcIAs), and;
- A Bespoke Greater Horseshoe Bat Mitigation Plan for BT3 (for further information see Appendix C of this HRA screening document).

5.5.4. The provision of Bespoke Mitigation Plan to support planning applications is a requirement under Policy BT3 of the TDC Local Plan. Such detailed information will enable the planning authority to undertake a final 'project level' HRA to ensure that all necessary mitigation is an integral part of the proposed development.

**Table 1 Likely Impacts and their Implications for the SAC Conservation Objectives**

Likely Impacts Arising from Development	Implications for SAC Conservation Objectives (See Appendix B)
<b>Loss of habitat connectivity</b> through removal of or damage to linear habitat (e.g. trees and hedgerows resulting in the loss of key areas of commuting habitat used by greater horseshoe bats.	Reduction in the extent and distribution of the habitats used by relevant qualifying species.
<p><b>Disturbance from human activities along commuting routes</b> where development is located too close to commuting habitat causing an adverse effect (primarily) from new sources of artificial light – either from within the new houses or from external lighting e.g. vehicles and street lighting.</p> <p><b>Decline in habitat quality and/or connectiveness</b> around satellite roosts leading to their eventual abandonment;</p> <p><b>Disturbance from construction activities along commuting routes</b> where increased noise and light may have an adverse effect in adjacent habitats.</p> <p><b>Loss of potential foraging habitats</b> leading to the bats having to travel further to find suitable prey.</p>	Change in habitats used by relevant qualifying species, such that the structure and/or function of those habitats is compromised (not maintained).
<p><b>Increased length of commuting routes</b> leading to the bats having to travel further to navigate through the landscape to the north of Bovey Tracy and with consequent greater expenditure of energy to do so.</p> <p><b>Restriction on the bats' ability to disperse</b> and move to and from roosts and foraging areas either side of Monks Way (the A382 through Bovey Tracy). Such movement may occur on a regular daily basis, or on a more infrequent seasonal basis; such as in the:</p> <ol style="list-style-type: none"> <li>late summer and early autumn when males and females are seeking each other out to mate, and;</li> <li>early spring and late autumn when the bats may be using routes through BT3 in order to migrate to and from their hibernation roosts used through the winter.</li> </ol>	Change in the distribution of the relevant qualifying species across the South Hams SAC



## 5.6 Is it Likely That Impacts Can Be Mitigated Effectively?

- 5.6.1. Mitigation measures for GHBs should support the SAC *Conservation Objectives* set by Natural England and also promote *Favourable Conservation Status* for this species (see Appendix B.2 and B.2). As such, mitigation measures for BT3 should aim to:

*Facilitate ease of movement and conserve energy expenditure by Greater Horseshoe Bats by providing optimal daily and seasonal commuting routes around and through the proposed new built up areas and by retaining and enhancing foraging and roosting opportunities.*

- 5.6.2. In order to achieve the above aim, and to provide the certainty necessary to satisfy the requirements of the HRA process, the following mitigation principles must be incorporated into the development framework for BT3 area. This mitigation must then be secured and implemented in full at such time as development applications are brought forward. Such mitigation should be a combination of identifying and recognising:

- key design constraints required to avoid or minimise<sup>22</sup> adverse effects, and;
- habitat mitigation/enhancement opportunities to provide overall net gains<sup>23</sup> for GHBs specifically and for wider biodiversity in general.

- 5.6.3. *The following Design Principles should be followed to:*

- i. Ensure that the development proposals do not sever key habitat connectivity and thus hinder the potential for daily commuting and seasonally migrating bats to move through the Ashburton Rd/Monks Way pinch point in an east-west direction, so that they are able to reach open countryside and near optimal foraging habitat on either side of Bovey Tracy. This to be achieved by protecting the functionality and integrity of sufficiently high quality commuting habitat through the site through the following measures:
  - a. Provision and long-term maintenance of a dark landscape corridor beside the Bovey Pottery Leat that is at least 15m wide at its narrowest point and has light levels within it from adjacent new build of no greater than 0.5 lux, as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
  - b. Provision of a hedge bank along the above corridor, the inner toe of which should be at least 15m from the edge of the Leat, in order to provide a buffer from both physical disturbance and light spill from proposed adjacent detached self-build properties;
  - c. Construction of no buildings within 25m of the edge of the Leat;
  - d. Provision of variability in the width of the corridor along the Pottery Leat. The width of the corridor should be as wide as is practicable reflecting the fact that the existing fields are irregular in width. In other words, the corridor may have bulges along it which may act as further foraging opportunities for bats, especially if planted with low growing shrubs and fruit trees to attract insect prey. Provision should also be made for temporary night roosts (see Section 4.6.4 above) to enable commuting bats to rest during the night;

<sup>22</sup> Adverse effects should be 'minimised' to the point where either alone or in combination with other effects they do not have an adverse effect on the integrity of the South Hams SAC.

<sup>23</sup> The achievement of a net gain for biodiversity is consistent with the objectives set out in paragraph 118 of the National Planning Policy Framework.

- e. Provision of habitat enhancement through the upgrade of public realm lighting around the junction of Brimley Vale and Ashburton Road e.g. with new more bat friendly street lighting (e.g. with light in the warmer part of the spectrum)
- ii. Protect the functionality and integrity of sufficiently high quality commuting habitat along the green corridors planned between Areas 'A' and 'B', Areas 'A' and 'G', Areas 'B' and 'C', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
- iii. Achieve no overall net loss of hedgerows and trees within BT3;
- iv. Avoid light spill in bat flyways and foraging areas i.e. achieve light levels less than 0.5 lux;
- v. Minimise potential interruption of bat corridors by the new road network and especially for the proposed roads through:
  - a. the central hedgerow and watercourse between Areas 'A' and 'B', and Areas 'B' and 'C', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;
  - b. the mature hedgerow between Areas 'A' and 'F', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;

*NOTE: Road mitigation to be achieved through a combination of sensitive ground shaping (e.g. earth bunds, banks and cuttings), sensitive lighting design, sympathetic landscape design, vehicle speed restrictions and vehicle 'calming' measures<sup>24</sup> - in order to avoid and reduce risk of vehicle collision with bats and to avoid disturbance caused from artificial light spill into flight routes<sup>25</sup>;*

- vi. Ensure that any public footpath / cycleway through and/or along the bat corridors are either unlit or are lit through a very carefully designed scheme that minimises light spill in sensitive locations, while at the same time providing a safe and adequately lit route for pedestrians and cyclists.
- vii. Ensure that the provision of areas of public realm open space in or near the bat corridors identified – while being potentially multifunctional - are designed and maintained to also provide habitat for commuting and foraging greater horseshoe bats.

*Habitat Mitigation/Enhancement Opportunities should where appropriate:*

- viii. Undertake tree planting in order to provide more diverse foraging habitat for GHBs;
- ix. Mitigate (both on and offsite site where necessary) for the loss of hedgerow (flyways) and foraging habitat (pasture);
- x. Provide landscape buffers at least 10m wide between bat flyways/foraging habitat and the newly built development in Areas 'A', 'B', 'C', 'D' and 'G', as shown on the Land Use Plan at Appendix D of the Development Framework Plan;

<sup>24</sup> One of the key measures available to mitigate potential risk of vehicle collisions with bats through BT3 is through the imposition of a speed restriction. This should be possible as a necessary requirement arising out of the Habitat Regulations Assessment of the Challabrook proposals, whereby Devon County Council as the Highway Authority is legally obliged to consider a plan or project (for which it is the competent authority) in the context of Regulation 61 of the Habitat and Species Regulations (2010).

<sup>25</sup> All mitigation aimed at providing safe road crossings for bats must follow the *precautionary principle* and be informed by latest research and best practice, such as Berthunissen and Altringham (2015) and Grace-Fensome and Mathews (2016).

- xi. Create two new bespoke greater horseshoe bat roost(s)<sup>26</sup> to support and improve the number and distribution of satellite roosts; these to be in appropriate locations either within the green infrastructure in BT3 or within the surrounding landscape;
- xii. Contribute appropriately to the replacement of existing light columns on the northern edge of the car park on Station Road with more bat-friendly lighting, in order to achieve a darker corridor along the river as it passes through the pinch point between the car park and Devon Guild of Craftsmans' Gallery.

*NOTE: The above proposals for bespoke new roosts and lighting measures are entirely consistent with paragraph 118 of the National Planning Policy Framework – where development may be expected to contribute to biodiversity enhancements. Furthermore, such measures would be particularly consistent with Regulation 39 (see Section 1.3 above), especially where these augment other mitigation measures that seek to ensure connectivity across the landscape for greater horseshoe bats.*

- xiii. Provide long-term habitat management, for bat flyways and greenspace through a Landscape and Ecological Management Plan (LEMP), secured through a planning condition and/or obligations;
  - xiv. Implement development through the means of a prior-approved Construction Environmental Management Plan (CEMP), secured through a planning condition;
  - xv. Undertake appropriate and proportionate ecological monitoring of the LEMP to establish the effectiveness of proposed mitigation measures and to provide early warning of any necessary contingency or remedial measures required to meet original objectives;
- 5.6.4. The provision of above measures are consistent with the four principles set out in section 1.3.3 of this Screening Assessment.

## 6. Consideration of 'In combination' Effects

### 6.1. Statutory Requirement

- 6.1.1. When undertaking HRA, the underlying purpose of Article 6(3) of the Habitats Directive must be considered. This is to ensure that a plan or project is authorised only to the extent that it will not, either 'alone' or 'in combination' with other plans or projects, adversely affect the integrity of a European site. The following sections consider the likely significant effects of BT3 in relation to 'in combination' effects generated by other plans and projects that may affect the integrity of the South Hams SAC.

### 6.2. In Combination Effects of New Large-scale Development: Torquay to Bovey Tracy

- 6.2.1. Map 4 shows an overview of new and proposed development between Edginswell at the northern edge of Torquay up to the northern tip of Bovey Tracy. When viewed at this scale, what becomes apparent, coupled with the extent of existing built up areas, is the presence of an almost unbroken line of development (of one form or another), which together add up to extensive areas of inhospitable land and/or extensive potential barriers in the landscape for greater horseshoe bats, stretching all the way from Torbay to Dartmoor.
- 6.2.2. In order to take into account the likely 'in combination' effects arising from all the above development, Teignbridge District Council has commissioned a separate supplementary

<sup>26</sup> Examples of such roosts include a night roost/perch in the corridor along the Pottery Leat and/or a more substantial day roost in an appropriate location that may be either on site or offsite with the agreement of an appropriate landowner.

'settlement wide' appraisal<sup>27</sup> to be read in conjunction with the allocation-specific HRAs prepared for NA1, NA2, NA3, BT3 and BT1. In this way, the Council can be sure that it has examined at the landscape scale the 'in combination' effects on the SAC arising from various kinds of development across the district.

- 6.2.3. The preparation of the 'settlement-wide' appraisal and the individual allocation-specific HRAs have run in parallel and has been very much based on an iterative process where information from one document has informed the other, and vice versa. This process has hopefully led to a situation where the likely 'in combination' effects, identified through the settlement-wide appraisal, have been almost simultaneously addressed through the mitigation measures recommended in each of the allocation-specific HRAs. These in turn have then been used to inform the mitigation measures necessary for incorporation into each of the Council's Development Framework Plans.
- 6.2.4. For the purpose of this document, a summary of the likely overall 'in combination' effects across the district are presented below along with:
- an explanation of how they are relevant to the proposed development in and around Bovey Tracy, and;
  - an assessment of how the proposed mitigation measures to be delivered as an integral part of development at BT3 (see Section 5.6.3 above) address these landscape scale effects as they apply at Challabrook.

### **6.3. The Likely 'In Combination' Effects of Proposed Development on Greater Horseshoe Bats**

- 6.3.1. The recent and proposed projects shown on Map 4 constitute a significant cumulative change in the landscape and one that, without adequate mitigation, could result in significant additional barriers for greater horseshoe bats to negotiate when moving through this landscape.
- 6.3.2. As and where the landscape becomes less hospitable for greater horseshoe bats, necessary changes in flight routes, caused by the loss of existing foraging and commuting routes, may of necessity lead to the adoption of new routes that involve longer distances and require greater expenditure of energy with diminished access to suitable foraging areas.
- 6.3.3. The viability of some routes may be lost entirely, or the risks associated with others (e.g. road crossings) may result in reduced permeability and dispersal across the landscape and/or increased mortality.
- 6.3.4. Ultimately, the risk is that the sub-population associated with the Chudleigh SAC roost in the east becomes significantly more isolated from the greater horseshoe population across the wider SAC area to the south and west. If this occurs it could represent an adverse change in the distribution and abundance of greater horseshoes across South Devon. Such effects would be:
- in conflict with the *Conservation Objectives* (see Annex B.1 of this HRA) for the South Hams SAC as set out by Natural England, and;
  - be likely to have an adverse effect on the *Favourable Conservation Status* (see Annex B.2 of this HRA) of greater horseshoe bats in South Devon.
- 6.3.5. Map 4 shows the extent to which existing and proposed development between the A38 and the northern tip of Bovey Tracy acts as a barrier to greater horseshoe movement through the

<sup>27</sup> Greenbridge (2016) *South Hams SAC Settlement-Wide Mitigation Appraisal For Teignbridge: Development 'Pinch Points' And Assessment Of Likely 'In Combination' Effects On The South Hams SAC.*

landscape, with limited opportunities for the bats to navigate their way from east to west and vice versa.

- 6.3.6. Aerial Photo 3 shows the three main landscape corridors that provide the bats with the best opportunity to find access through the built landscape at Bovey Tracy. While development at Challabrook will not affect connectivity around the northern and southern routes, unless adequately mitigated, it does have the potential to worsen the overall barrier effect by closing off the potential east-west route through the central area of the town.
- 6.3.7. To address this, the guiding principles presented in Box 1 above have been applied at Challabrook through a combination of mitigation measures outlined in Section 5.6.3 above. These measures have been specifically conceived to ensure that adequate and unlit habitat features remain to ensure that current connectivity is retained through development at BT3 (especially through the southern part of the site along the Pottery Leat Corridor). In this way, it can be demonstrated that development at Challabrook can proceed without contributing to any 'in combination' effects that might prevent greater horseshoe bats moving through the landscape.

## 7. Conclusion

- 7.1. In undertaking any HRA Screening Assessment, the Council must ascertain that the plan and/or proposals would not adversely affect the integrity of a European site. This should only be concluded if the Council has made certain that this is the case. In order to be certain, the plan-making body should be convinced that no reasonable scientific doubt remains as to the absence of such effects<sup>28</sup>
- 7.2. However, an absolute guarantee that there will be no adverse effect on site integrity is not possible. The best that can be achieved is for the competent authority to identify the potential risks, so far as they may be reasonably foreseeable, in light of such information as can reasonably be obtained, and then put in place a legally enforceable framework with the aim of preventing the risks from materialising<sup>29</sup>.
- 7.3. In undertaking this HRA Screening Assessment, the Council has referred all of the data available to it on the occurrence and distribution of greater horseshoe bats both within BT3 and across the surrounding landscape.
- 7.4. The BT3 Challabrook Development Framework Plan has acknowledged the potential risks of development to greater horseshoe bats and consequently has set out mitigation measures that accord with the recommendations set out in this HRA screening assessment which are necessary to avoid such risks from occurring.
- 7.5. Consequently, since it is possible to identify appropriate and adequate mitigation that will avoid significant adverse effects (that are capable of being secured through the determination specific planning applications), it is possible to conclude that there will be no *Likely Significant Effect* (LSE) on the South Hams SAC.
- 7.6. However, it is essential that all necessary mitigation is secured and implemented. Consequently, the Council must – in order to discharge its statutory obligations – ensure that all future planning applications are subjected to adequate scrutiny through an HRA LSE Screening Assessment and, where necessary, an Appropriate Assessment wherever uncertainty remains over possible adverse effects on the integrity of the SAC.

<sup>28</sup> See paragraph 61 European Court of Justice case C-127/02 dated 7th September 2004, 'the Waddenzee ruling'

<sup>29</sup> WWF-UK Ltd and RSPB v Secretary of State for Scotland et al [1999] 1 C.M.L.R. 1021 [1999] Env LR 632, Court of Session, Edinburgh, 28th October 1998

## APPENDIX A

### PROTECTION AND ENHANCEMENT OF ECOLOGICAL NETWORKS

- A.1.1 Across Europe, all of the Special Areas for Conservation (SACs) and Special Protection Areas (SPAs) together contribute to the European Natura 2000 network. The protection, management, and enhancement of such ecological networks, and especially those relating to the *Natura 2000* network, are identified as being particularly important in the *EU Habitats Directive*.
- A.1.2 Article 3 of the Directive states:  
*Where they consider it necessary, Member States shall endeavour to improve the ecological coherence of Natura 2000 by maintaining, and where appropriate developing, features of the landscape which are of major importance for wild fauna and flora, as referred to in Article 10.*
- A.1.3 Article 10 then goes on to explain:  
*Member States shall endeavor, where they consider it necessary, in their land use planning and development policies and, in particular, with a view to improving the ecological coherence of The Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems of marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.*
- A.1.4 *The Conservation of Habitats and Species Regulations* (2010) transpose the above EU Directive into English legislation. Regulation 39 requires development Plan policies to include policies that implement at the local level the requirements of Article 10 so as to encourage the management of features of the landscape which are of major importance for wild flora and fauna.
- A.1.5 In relation to the recent and potential development discussed in this document, Regulation 39 provides Teignbridge District Council with an opportunity to link conservation objectives to the development of some if not most of the sites under consideration. In particular, the LPA has both a justification and a statutory mechanism by which they can seek through their development Plan policies the management and enhancement of landscape features in and around the Local Plan Areal which are of major importance for GHBs.
- A.1.6 For instance, planning for Green Infrastructure in and around the areas of development discussed in this document could also lead to significant biodiversity gains and substantial improvement of GHB commuting and foraging habitat providing the bats with a very much enhanced flyways around and through the settlements between Torquay and Bovey Tracy. Such measures could also contribute to wider Green Infrastructure objectives and achieve benefits that could then also be enjoyed by the local community.



## APPENDIX B

### SAC CONSERVATION OBJECTIVES AND GHB CONSERVATION STATUS

#### B.1. South Hams SAC Conservation Objectives

- B.1.1 As required by the Habitats Directive, high-level 'Conservation Objectives' for the South Hams SAC have been identified by Natural England. An overarching objective and a list of further generic objectives aim to:

*'Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.'*

*This is to be achieved by, subject to natural change, maintaining and restoring:*

- *The extent and distribution of the qualifying natural habitats and habitats of qualifying species.*
- *The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.*
- *The supporting processes on which qualifying natural habitats and habitats of qualifying species rely.*
- *The populations of qualifying species.*
- *The distribution of qualifying species within the site'.*

*NOTE Natural England is in the process of preparing site-specific objectives for each SAC and SPA in England.*

- B.1.2 The application of these objectives will be site specific and dependant on the nature of the site and its features. The local planning authorities should take these objectives into account when undertaking Habitat Regulations Assessments.

#### B.2 Favourable Conservation Status (FCS)

- B.2.1 Article 2(1) of the Habitats Directive states that 'Measures taken pursuant to this Directive shall be designed to maintain or restore at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest' (emphasis added).

- B.2.2 The concept of 'conservation status' is therefore fundamental to the purposes of the Habitats Directive. Article 1(i) defines the conservation status of a species as:

*'the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its population within the territory referred to in Article 2' and continues that the conservation status of the species will be taken as 'favourable' when:*

- *'population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and*
- *the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and*
- *there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis'*

## APPENDIX C

### OUTLINE STRUCTURE FOR A GREATER HORSESHOE BAT BESPOKE MITIGATION PLAN

An evidenced based and bespoke mitigation plan for greater horseshoe bats should provide information on 'why', 'what', 'where', 'when' and 'how' the various necessary mitigation proposals will be provided and 'who' will be responsible for their implementation. As such the plan should include:

- a) Summary of greater horseshoe activity and suitable habitat features recorded on site and in the surrounding landscape – so as to provide context for on-site mitigation proposals.
- b) Purpose (e.g. overall aim) and conservation objectives for all proposed mitigation measures intended to support greater horseshoe bat conservation associated with any specific planning application<sup>30</sup>.

*NOTE: Where the Council has prepared a Habitat Regulations Assessment Screening Report for a Development Framework Plan, this should be used to provide context for and to inform the aims and objectives of the bespoke mitigation plan.*

- c) Review of site opportunities and constraints (e.g. illustrated visually where relevant through an *Ecological Constraints and Opportunities Plan* (ECOP – see BS42020 Clause 5.4 page 17).
- d) Design concepts, principles and details and intended working method(s) for all capital works necessary to achieve stated objectives<sup>31</sup>.
- e) Extent and location/area of all detailed proposed mitigation measures shown on appropriate scale maps and plans.
- f) Type and source of materials to be use where appropriate; for instance:
  - i) native species as an integral component of landscape planting and/or
  - ii) materials for any capital works e.g. bespoke bat roosts or road crossing points e.g. underpasses.
- g) Measures necessary to avoid or mitigate adverse effects during the construction of the proposed development e.g. to be secured through a *Construction Environmental Management Plan* (CEMP).
- h) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
- i) Details for disposal of any wastes arising from works.
- j) Details of long-term management to sustain proposed features for future generations e.g. to be secured through a detailed *Landscape and Ecological Management Plan* (LEMP).
- k) Details for monitoring and remedial/contingencies measures e.g. to be secured through a detailed *Ecological Monitoring and Contingencies Strategy* (EMCS).
- l) Persons responsible for implementing the works.

The above outline is based on Annex 4.3 and 4.4 of BS42020 *Biodiversity – A Code of Practice for Planning and Development* (2013).

<sup>30</sup> It may be useful to demonstrate how the purpose and conservation objectives for proposed mitigation on (and where appropriate offsite) may assist in the achievement of the over-arching Conservation Objectives set for the South Hams Special Area of Conservation (SAC) by Natural England.

<sup>31</sup> Design details and working methods should provide sufficient information to demonstrate that the proposed mitigation will deliver stated aims and objectives if granted consent. Particular regard should be given to:

- (i) likely effectiveness, e.g. proposed mitigation measures are appropriate to the case and technically feasible and, if implemented, likely to achieve desired outcomes;
- (ii) certainty over deliverability, e.g. there is evidence of commitment and adequate legal mechanisms to secure sufficient land and resources to implement necessary measures, and;
- (iii) whether the intention is to secure proposed measures, and the necessary resources for their delivery, through either planning condition(s) and/or a planning obligation - or other appropriate mechanism.

## REFERENCES

### References in Relation to Habitat Regulations Assessment of Development Plans

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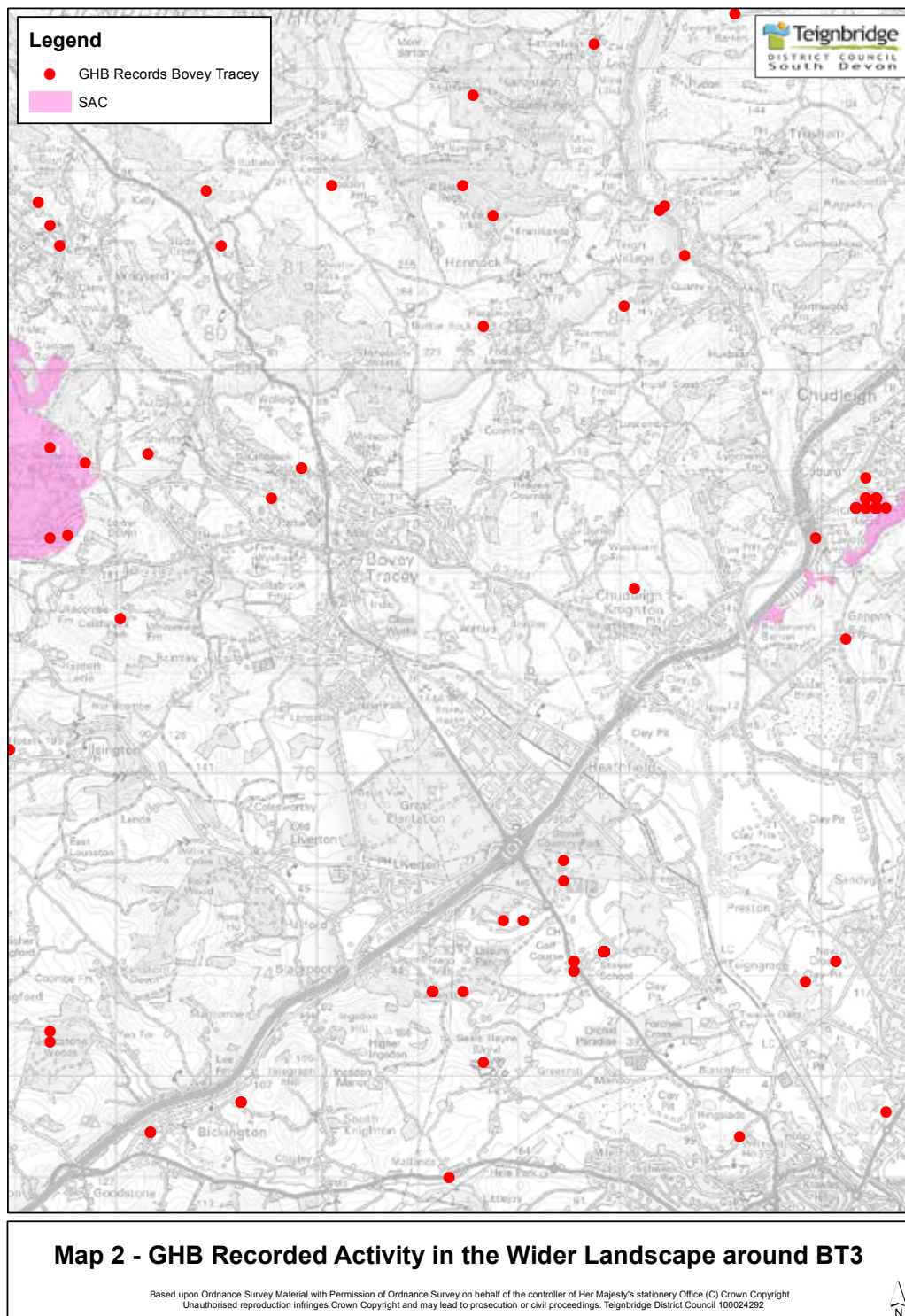
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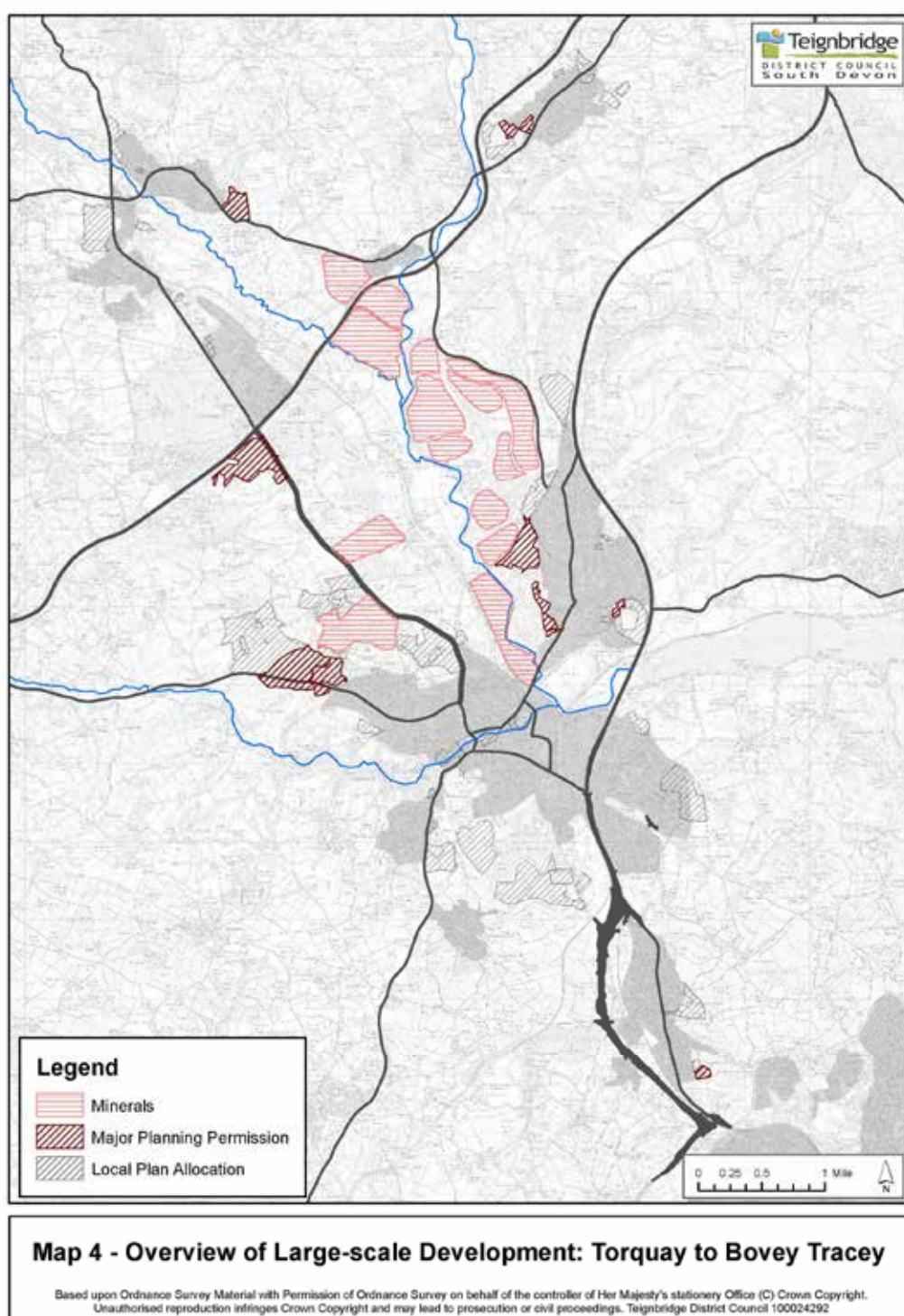
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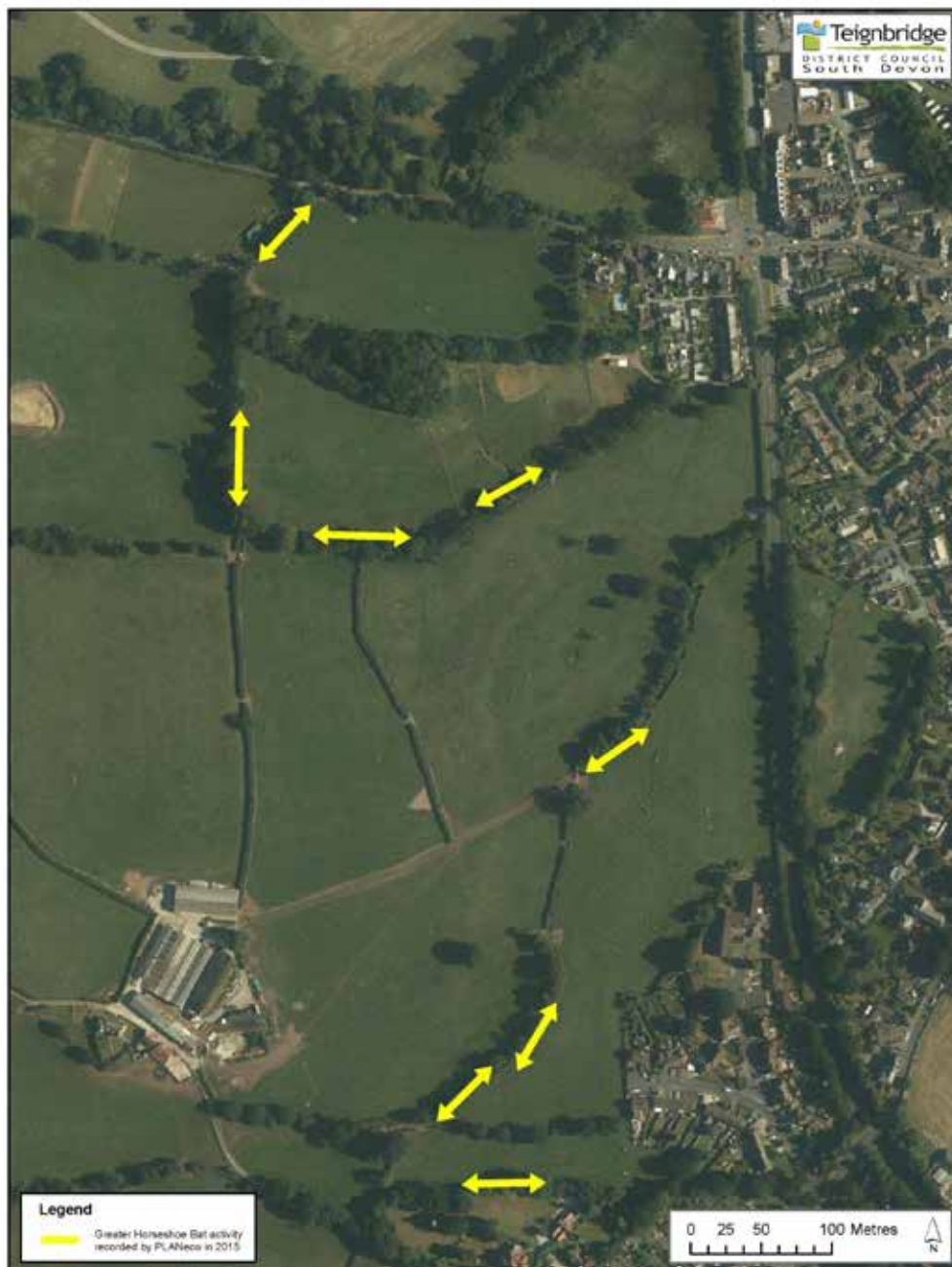
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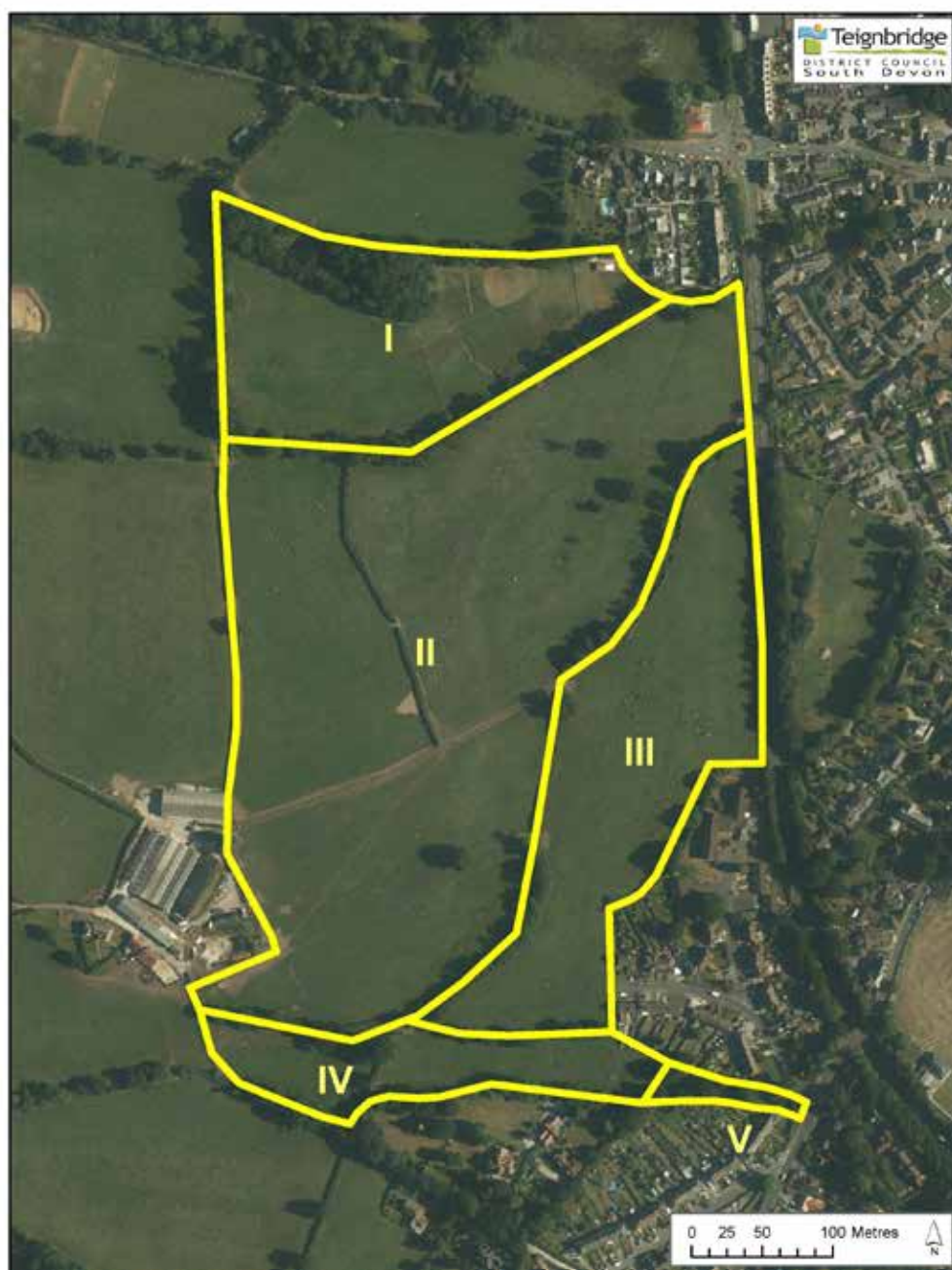




### Aerial Photo 1 - Recorded GHB Activity within BT3

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**Aerial Photo 2 - Land Parcels within BT3**

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**Aerial Photo 3 - Landscape Connectivity for GHB through Bovey Tracey**

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### Draft Strategic Environmental Assessment – Screening Statement for BT3 Challabrook, Bovey Tracey Development Framework Plan

The draft BT3 Challabrook, Bovey Tracey Development Framework Plan (DFP) has been prepared in line with the Teignbridge Local Plan 2013 – 2033.

The draft DFP expands on the requirements set out in Policy BT3, for employment, housing, flood mitigation, green infrastructure, sustainable movement and Greater Horseshoe Bat mitigation. The DFP will be a material planning consideration in determining planning applications submitted for development of the site, ensuring that the overall policy requirements are met.

The draft DFP includes an indicative Land Use Plan for the BT3 allocation.

#### SEA Screening

Strategic Environmental Assessment (SEA) is a process to identify likely significant effects of a plan or policy on the environment. The requirement to assess certain plans and programmes is set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which transpose the European Strategic Environmental Assessment Directive (2001/42/EC). An SEA is required where plans may have significant environmental effects. Schedule 1 of the Regulations set out the criteria for determining whether an SEA is required and these are considered below:

1. The characteristics of plans and programmes, having regard, in particular, to—
  - (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
  - (b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
  - (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
  - (d) environmental problems relevant to the plan or programme; and
  - (e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—
  - (a) the probability, duration, frequency and reversibility of the effects;
  - (b) the cumulative nature of the effects;
  - (c) the transboundary nature of the effects;
  - (d) the risks to human health or the environment (for example, due to accidents);
  - (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
  - (f) the value and vulnerability of the area likely to be affected due to—
    - (i) special natural characteristics or cultural heritage;
    - (ii) exceeded environmental quality standards or limit values; or
    - (iii) intensive land-use; and
  - (g) the effects on areas or landscapes which have a recognised national, Community or international protection status.



The Draft DFP sets out additional detail on the implementation and delivery of Local Plan Policy BT3 – Challabrook. This has already been subject to Strategic Environmental Assessment (SEA), Sustainability Appraisal and Habitats Regulations Assessment (HRA). The Local Plan assessment took account of the environmental characteristics of the site and area, which have not changed since those assessments were prepared. The draft DFP sets out a framework of delivery of the site's development. Therefore, whilst additional details are contained within the DFP, these are within the parameters of the policy framework, already set out in the Local Plan.

The DFP will not influence other plans in a hierarchy, but is itself, highly influenced by the Local Plan, which has already been subject to Strategic Environmental Assessment. The DFP does not differ from the Local Plan requirements.

The Local Plan has also been subject to assessment under the Habitats Regulations and the Local Plan policies contain appropriate requirements needed to mitigate any impacts on the South Hams SAC, prepared in conjunction with Natural England. The DFP has itself been screened for the purpose of Habitats Regulations Assessment. It includes mitigation measures that are necessary for the protection of Greater Horseshoe Bat flyways and foraging areas, which has been used to inform the layout of the site, as set out in the Land Use Plan included within the DFP at Appendix D.

The Sustainability Appraisal/Strategic Environmental Assessment accompanying the Proposed Submission Local Plan assessed the environmental impacts of Policy BT3. The following table demonstrates any implications or variations that have arisen from the draft DFP and which may require further SEA.

SA/SEA Sustainability Objective	SA/SEA Comment on Policy BT3	Relevant DFP Details	Implications of DFP	Further SEA Req'd?
<b>A. Natural Environment</b> To protect, conserve and enhance the area's natural environment	The site is a Greenfield site adjoining the settlement and within sight of the National Park. The site itself is attractive, but not particularly sensitive in its own right. There would be some impact on the landscape in the area, although this would be limited by the mitigation measures proposed. Site screening evidence indicates that there is potential that this site falls within or close to the strategic flyways and sustenance zones for Greater Horseshoe Bats, which will require appropriate mitigation measures. As such, the allocation proposes measures to address the site's sensitive ecological nature and mitigate as appropriate.	The draft DFP identifies how the majority of the existing natural features on the site will be retained and enhanced, including the retention of a wooded area, to reduce the visual and landscape impact of the development and its impact on the setting of the National Park. The draft plan also includes a mitigation plan to prevent harm to the interests of Greater Horseshoe Bats with regard to foraging areas and the strategic flyway along the River Bovey.	The draft DFP provides a more detailed understanding of the site's constraints and requirements to ensure the protection of the setting of the National Park and to secure the necessary protection of Greater Horseshoe Bats. HRA screening indicates no need for further Appropriate Assessment.	No

SA/SEA Sustainability Objective	SA/SEA Comment on Policy BT3	Relevant DFP Details	Implications of DFP	Further SEA Req'd?
<b>B. Built Environment</b> To preserve and improve the area's built environment and heritage assets	The site adjoins the Conservation Area to the north, but design and layout would ensure no harm to its character or setting.	The draft DFP identifies an area of land adjacent to the Conservation Area which will remain undeveloped. This will provide an open space buffer to the Conservation Area and will protect its setting. Design codes have not been included, but reference is made to encouraging detailed designs that will respect the local vernacular architecture.	The draft DFP provides little additional detail in relation to this SEA objective that goes beyond the criteria previously assessed in the full SA/SEA for Policy BT3 of the Local Plan.	No
<b>C. Climate Change</b> To mitigate and adapt to possible effects of climate change	The site is about 600 metres from the town centre, and there are shops closer, so a reasonable proportion of residents would be able to walk to the town centre and other services. Inclusion of a primary school within the site would also act to reduce travel. Employment development within the site would act to improve the self containment of the town, creating the potential for less out-commuting.	The draft DFP continues to promote sustainable movement (see section 3.5 of the DFP) and integrated employment on the site (see section 3.2 of the DFP).	A more detailed understanding of the site has refined the site's layout in terms of internal and external links, which will promote walking and cycling and, to deliver employment uses on the site, as envisaged in the Local Plan policy and covered in the Local Plan SEA.	No
<b>D. Resource Use</b> To minimise the loss or degradation of finite natural resources	The site is greenfield with grade 3 agricultural land. Use of sustainable urban drainage would ensure flood and water management and mitigation. On balance the site would have limited impact on resource use.	The draft DFP shows how the development required by the policy can be provided for within the boundary of the allocation site. Flood modelling has been undertaken for the site and has informed the layout, which identifies an area of land that will be used for flood storage and with attenuation basins, to prevent flooding of the site itself and to reduce the risk of flooding downstream from the tributaries of the Rover Bovey.	The draft DFP provides additional detail in the form of flood modelling and design response and mitigation as shown at Appendices D and E. This would result in environmental improvement to areas downstream in terms of reducing flood risk and there would be no significant change to the impacts, as previously assessed in the full SA/SEA for policies BT3 of the Local Plan.	No

SA/SEA Sustainability Objective	SA/SEA Comment on Policy BT3	Relevant DFP Details	Implications of DFP	Further SEA Req'd?
<b>E. Jobs and Local Economy</b> To foster an entrepreneurial economy with improved productivity, providing a strong employment offer	The provision of employment will be beneficial to job creation and the local economy. New housing will generate short term employment during build-out. New households will generate economic activity including supporting local shops and businesses.	Section 3.2 of the draft DFP provides detail on the size and location of the employment areas within the allocation site, which have been chosen to provide a commercially attractive road frontage site and a smaller site to act as a buffer between Challabrook Farm and residential development.	A more detailed understanding of the size and location of the employment sites is provided, but there would be no significant change to the economic impacts expected, as previously assessed in the full SA/SEA for policies BT3 of the Local Plan.	No
<b>F. Town Centres</b> To strengthen and safeguard the vitality and viability of our town centres	There is likely to be some beneficial impact on the town centre from additional customers.	The draft DFP sets out how links to the town centre would be provided (see section 3.5 of the DFP), but makes no other specific reference to the town centre.	The draft DFP provides little additional detail in relation to this SEA objective that goes beyond the criteria previously assessed in the full SA/SEA for policy BT3 of the Local Plan.	No
<b>G. Housing</b> To provide and maintain a sufficient supply of good quality, mixed housing, including an appropriate level of affordable housing	Provision of housing including affordable housing	Section 3.3 of the draft DFP sets out the specific housing requirements for the site, including affordable housing and custom/self build housing.	No additional implications to those identified in the full SA/SEA for policy BT3 of Local Plan.	No
<b>H. Health</b> To support healthy lifestyles and a healthy local living environment	The creation of additional jobs, homes and public open space will have a positive impact on health.	Sections 3.2 (Employment), 3.3 (Housing), 3.4 (Green Infrastructure) and 3.5 (Sustainable Movement) provide additional detail to BT3 policy requirements and continue to promote the health and wellbeing of the community.	The additional detail provided within the DFP would not result in any additional implications to those identified in the full SA/SEA for policy BT3 of Local Plan.	No



SA/SEA Sustainability Objective	SA/SEA Comment on Policy BT3	Relevant DFP Details	Implications of DFP	Further SEA Req'd?
<b>I. Infrastructure</b> To ensure sustainably balanced places are created or maintained, providing access to an appropriate mix of services and facilities	Significant provision of infrastructure will benefit the community, including employment land, a primary school, cycle and footpath provision, playing pitch space, and flood risk mitigation.	The adopted BT3 policy does not include the need to provide a primary school and this has not been included within the draft DFP. (This has been included within Policy BT4 of the Local Plan). The draft DFP does include employment land (see section 3.2 Employment), cycle and footpath provision (see section 3.5 Sustainable Movement) and, flood risk mitigation (see section 3.1 Mitigating Flood Risk).	The community will continue to benefit from the infrastructure provided on site, from the incorporation of flood attenuation measures and also from the improved footpath and cycle links provided. The omission of the primary school requirement from the adopted policy BT3 is compensated for through its allocation within policy BT4 (Land of Le Molay Littry Way). As such, the additional detail provided within the DFP would not result in any additional implications to those identified in the full SA/SEA for policy BT3 of Local Plan.	No

## Conclusion

The SEA screening indicates there are no new significant effects likely to arise through the implementation of the draft BT3 Challabrook Development Framework Plan that have not previously been identified through the full SA/SEA of the Teignbridge Local Plan. Therefore full Strategic Environmental Assessment of the BT3 Challabrook Framework Plan is not required.

