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Action on Climate in Teignbridge's Ecological response to the Local Plan Sites Consultation – including comments on Agricultural land.

(This response has been compiled with contributions from members of the ACT Ecology Group and the ACT Wildlife Wardens. We are very grateful to them for sharing their local knowledge.)

These are ACT's general Ecological comments on the Site Selection process:

- **Climate change is the hardest challenge that wildlife faces** – but we, the public, can help by creating more habitats, reducing pesticide use and buying sustainably-grown food. One of the best ways that Teignbridge District Council can help is by ensuring that its new Local Plan pushes developers towards building low-carbon houses of the right size and in the right places. To help wildlife directly it should choose sites that **cause the least damage and give the most benefit to wildlife.**
- **Development must be necessary.** The vast majority of development will cause disturbance and loss of wildlife in the short-term; it also accelerates climate change. Mitigation is expensive, difficult and requires enforcement. So, development should only proceed if and when it is definitely needed.
- **Safeguarding existing wildlife and increasing it by 10%.** The Plan should safeguard important wildlife sites and provide the 10% increase for biodiversity that will very soon be legally required of new developments. This is required to be achieved on or near the site; and whilst some of the sites suggested are big enough to accommodate development and biodiversity gain, some developers will need to find extra land in the vicinity which can be improved for wildlife.
- **Putting the Council's declaration of an Ecological Emergency into the Site Selection process:** Site selection should go further than simply complying with legal protections for wildlife and the new 10% gain. Teignbridge District Council has declared Climate and Ecological Emergencies, so it now has a greater responsibility to put much stronger Climate and Ecology safeguards into its new Local Plan Sites selection. A more stable and thriving ecosystem can make an enormous contribution towards controlling climate change by sequestering carbon in trees and plants and by retaining carbon as organic matter in soils. Well-designed developments on suitable sites will have less negative impacts on flooding, river quality and marine life.
- **Giving wildlife mitigation a high priority:** It is noticeable that most sites under consideration either have, or probably have, protected species and protected habitats, as well as often being close to designated sites. Species which don't have Protected Status are extremely important too - they are all part of our fundamental ecosystem and nothing (in particular humans) can survive without an entire ecosystem. This makes it absolutely vital that our Planners take wildlife mitigation just as seriously as every other aspect of development. The four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed.
- **Requiring essential wildlife mitigation to be carried out before development starts:** Wildlife mitigation will only be successful if mitigation measures are completed before site clearance and building starts, **otherwise serious wildlife damage is guaranteed.** This is currently a serious problem, with wildlife dying for lack of habitat while developers concentrate on building houses and evade their legal responsibilities to wildlife. In particular, most of the mitigation **MUST** be done in advance of development. If this is not taken seriously and enforced, then our District's wildlife will not be able to survive the combined effects of development, intensive farming and climate change.
- **Creating new habitats:** When new habitats need to be created as mitigation, the best type of habitat should be carefully chosen and specified.
 - The vast majority of Teignbridge's standard orchards (Priority Habitats with large fruit trees) have been lost over the last 60 years - resulting in much biodiversity loss. yet they are inexpensive,

quick and easy to establish, providing excellent community and wildlife spaces, quickly sequestering carbon.

- Hedges and woods are vital for carbon sequestration, but usually need protection against damage by deer, rabbits and humans. Non-plastic tree guards should be used. Hedges carefully sited around contours can significantly reduce flood risks,
- Wet areas and SUDS (Sustainable Drainage Systems) are important habitats which have been lost to drainage and intensive farming. Creating new wet habitats is one of the quickest ways to help insects to recover - stabilising ecosystems. Scrapes, ditches and ponds are extremely valuable. Whenever possible, culverted streams should be released to flow naturally.
- 'Pocket Parks' created within medium to large developments should include as many different habitats as possible.
- Where farmland birds, such as Cirl Buntings, are found, areas of arable weeds, organic spring barley, or similar, need to be grown to provide winter food for them. They also need areas of grassland close to their nesting sites which are only mowed in the autumn so that grasshoppers (the main food for their chicks) can survive.

- **The need for on-site, ecological surveys to be carried out before final decisions are made on site selection:** The Ecological information in the consultation is based on desk-top surveys which were carried out by the Biodiversity Officers. This information has been simplified to conform to the Local Plan Consultation format. ACT supports the large amount of research carried out already, but now on-site ecological surveys are needed to ensure that the Council doesn't make any serious and costly mistakes that could damage local support for the Council and its reputation. The final Plan needs to be very clear and detailed about protected habitats and species present on every confirmed site in order to avoid them being damaged at the outline stage.

Further survey work and ground-truthing is needed where

- the information that TDC has provided has brought up queries about Unconfirmed County Wildlife Sites, Protected Species and Protected Habitats
- when information in responses from NGO's and from the public require it

*nb Because it is very unlikely that the Council's Biodiversity Officers have enough time to carry out this surveying, we ask TDC to consider contracting it out. If, and only if, **this is impossible**, please contact the ACT Ecology Group and Wildlife Warden Scheme as we have a very SMALL number of trained people who might be able to undertake some of this work.*

- **Wildlife connectivity:** This is the most important ecological factor, after conforming with legal protections and considering County Wildlife Sites and Unconfirmed Wildlife Sites. Wildlife needs **STRONG** corridors **through** developments and **between** sites.
 - Strong corridors are wide (usually at least 30 metres wide) and include continuous strips of the varied habitat types that mammals (including bats), birds, insects, other invertebrates and flowering plants need in order to not become socially and genetically isolated - and thus in danger of local extinction.
 - Teignbridge's hedges are mostly ancient and species-rich and they are vital wildlife corridors; they should usually be managed as wildlife corridors and should not be incorporated into gardens as garden hedges, where they are quickly either reduced, removed, or turned into exotic 'shrubberies'. New species-rich hedges should be created to strengthen connectivity on routes currently without hedges.
 - Corridors which follow waterways need to be particularly wide, to reduce disturbance. Waterways should be within corridors rather than running through private gardens, where 'tidiness' is a wildlife killer that destroys connectivity.
 - Many of the sites put forward have records of bats, so it is essential that any corridors which have footpaths or cycleways are either unlit or lit in a way that is approved for bats of all species **and other nocturnal wildlife, such as moths.**
 - Strong corridors through large developments are especially important.
 - This need for connectivity and corridors was confirmed in the Council's successful 'Connecting with Nature' part of the Newton Abbot Garden Town project.
- **Designing corridors so that they reduce road kill risks:** Increased numbers of cars using narrow lanes following the building of houses in rural communities makes wildlife and people much more vulnerable; cycling and walking become impossible, and especially dangerous for children. This makes the creation of wide corridors, suitable for people and all kinds of wildlife, an essential part of rural developments. In urban developments they are needed to give both wildlife and people opportunities to keep away from fast traffic and toxic exhaust fumes. They need to be bike-friendly and quite separate from roads. Occasionally green bridges will be needed to connect wildlife and people across major roads.

- **Helping wildlife biodiversity by reducing the amount of land needed for development:** Good site selection can further reduce the impact of developments on wildlife and the climate. This can be achieved by ensuring that developers mainly build smaller, low-carbon houses, preferably on brown-field sites in urban areas, because that is where people can most easily live lower-carbon lives. Because Teignbridge already has excellent wildlife areas near to urban centres, people whose homes have small gardens or just balconies can have a good quality of outdoor life. Opportunities for Communal Housing Schemes should also be considered - not only for older people who need support, but also for people of all ages who would like to share communal living spaces, resources and skills, in order to live more sustainably. For example, by growing their own food. *nb Most people on the Teignbridge housing list need one-bedroom accommodation and most local people need either one or two-bedroom accommodation. Teignbridge as the Planning Authority can do much to encourage and persuade developers to build more of these small houses. This will reduce the amount of housing land needed, reduce the carbon footprint of each house and reduce the housing list.*
- **Avoiding using Grade 1 Agricultural land for development:** Teignbridge only has a small percentage of Grade 1 Agricultural land. Even where there is a strong need for housing, it should be protected from development because of its crucial role in keeping local people fed and in helping prevent climate change. Our need for food is equal to our need for shelter. Although we can improve soils through good farming and horticultural practices, we cannot change their geology, which is the basis of good soils.
- **Enforcement:** Whilst acknowledging the Council's efforts to choose good sites for development, strong enforcement is needed to deter developers from damaging habitats and killing wildlife. Unless the Council has more Enforcement Officers, the Local Plan consultation could be a waste of time and money.

Comments on individual Sites

Chapter 3 Urban Renewal sites:

Newton Abbot Garden Town:

We completely support this TDC initiative – particularly the Connecting with Nature work, using development opportunities to strengthen connectivity for wildlife and people. Creating well-designed connections which are wide enough to accommodate both wildlife and people is vital.

Brunel Industrial Estate: 33 ha – 10 ha developable. 300-600 houses.

- The current industrial sites were built right up to the river bank, breaking connectivity for wildlife and people and causing the Templer Way to divert along the pavement. If this area is redeveloped then creating a **wide** corridor (at least an extra 40 metres wide) along the River Teign, which joins up and extends Aller Brook Local Nature Reserve, Wharf Road Sidings and Jetty Marsh Local Nature Reserves for wildlife and people is **essential**.
- Creating a wide corridor will also reduce flood risk for developments there.
- The grounds of Forde House are a valuable open space for this area, and should be improved for wildlife and people by creating new habitats eg encouraging some of the lawns to become meadows and renovating the old 'Swan Pond'.
- This is a good area for building small homes, giving maximum numbers of people access to good transport links and good wildlife sites.

Cricketfield area: 6.3 ha 150-200 houses

If this is developed then the River Lemon should be given a wide corridor for flood prevention and for wildlife.

Jetty Marsh and Wharf Road: 11 ha and 80-160 homes

As noted, flood risk would cut the amount of space for development – especially with rapidly rising sea levels.

Kingsteignton Retail Park:

Any re-development here should include better connection between Hackney Marshes Local Nature Reserve and County Wildlife Site with land to the west.

Wolborough Way:

We strongly support the stated ecological opportunities to improve the River Lemon corridor.

Comments on Chapter 4 Housing sites options in the Heart of Teignbridge.

Berry Knowles/A382 corridor 34.58ha of which 12.98 ha may be developable.

This area is rich in wildlife, with 3 CWS's close-by. It is important to many species that need wetlands and parts are known to have flooded in wet weather. Only small areas are suitable for housing and the wildlife known to be there needs strong, buffered corridors in order for it to survive.

West of Houghton Barton: 120 ha with 88 ha which may be developable as 1,600-2,100 houses.

This massive area would need especially good corridors for wildlife and people. The retention and buffering of the existing ancient hedges, which are Priority Habitats, is particularly important on large development sites.

Priory Road:

In order to maintain habitat connectivity between Decoy Country Park and the wider countryside, this site needs networks of wildlife corridors that connect with any that are in the plans for the NA3 development. Furthermore, wide buffer strips should be maintained around watercourses and hedgerows should be maintained and enhanced wherever possible.

Several sites of wildlife interest fall within this site. These are Forde Fields CWS ((unimproved wet neutral grassland with bird and amphibian interest). This site contains flower-rich pasture (DBAP) and species-rich hedges (DBAP/UKBAP)), Kingskerswell Fields UWS (SX869693) (unimproved grassland/heathland) and Priory Road OSWI (semi-improved grassland). Also, the Priory UWS borders this site. We ask that all of these sites be surveyed before planning permission is granted for Priory Road and that they are protected from development and enhanced for wildlife.

Several curlew bunting 250m buffer zones (breeding territory) fall within this site. If development is granted permission, hedges, scrub and grassland should be maintained within the buffer zone, along with appropriate management. If this is not possible, the four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed as outlined in the Wildlife and Development guidance note for curlew buntings.

This site contains a strategic flyway for greater horseshoe bats as identified in the South Hams SAC greater horseshoe bat consultation zone planning guidance. A series of bat surveys are required as outlined in the guidance. If planning permission is granted, findings from the surveys should be taken into account when implementing mitigation measures such as maintaining and enhancing hedgerows and preventing disturbance from artificial lighting.

Canada Hill:

This site is designated as Local Green Space in the Ogwell Neighborhood Plan. One reason for this is its value for safeguarding local food production, as it could be a suitable location for allotments, which are in high demand. Safeguarding local food production is important if we are to build resilient communities that are able to withstand climate change and there are few sites in Ogwell that are suitable for this, therefore this site should not be developed.

Should planning permission be granted, all hedgerows which fall within this site should be retained and enhanced to maintain habitat connectivity.

The site borders UWSs at Undercleave Wood and East Hill Fields as well as Ransley Quarry SSSI. These areas should be surveyed before any planning permission is granted. Although not registered as an ancient woodland, Undercleave Wood contains many ancient woodland indicator species, including field maple, moschatel, wild garlic, spindle, English bluebell, holly, stinking iris, crab apple, early purple orchid, primrose, redcurrant, field rose, sanicle, black bryony, wood speedwell and early dog violet. The area is on Devonian Limestone and East Hill fields is an example of rare limestone grassland habitat, which hosts a unique array of flora that favours calcareous soils. Development would result in increased use, which would damage these habitats.

Ogwell Central:

The land proposed incorporates a large section of a nature reserve that was set aside for wildlife and community use as compensation for a previous development. The nature reserve has a high diversity of flora and should **not** be developed.

The site falls within a strategic flyway for greater horseshoe bats as identified in the South Hams SAC greater horseshoe bat consultation zone planning guidance. A series of bat surveys are required as outlined in the guidance. If planning permission is granted, findings from the surveys should be taken into account when implementing mitigation measures such as maintaining and enhancing hedgerows and preventing disturbance from artificial lighting.

Conitor Copse:

Any development would be highly damaging to the vulnerable and important ecology of this small site and therefore it should not be developed. As mentioned in the site description, Conitor Copse contains a CWS, areas of ancient woodland and Conitor Cave, which is an important roosting and mating site for greater horseshoe bats.

Ecologist David F Wills was commissioned in 2013 to ascertain the likely impact of recent scrub clearance and tree felling at Conitor Quarry on any bats using the site. The report concluded that habitat clearance had likely impacted the ability of bats to forage and navigate around the site and consequently their ability to mate and breed successfully. David also referenced reports by Kestrel (2012) and Atkins (2011). Kestrel concluded that any development would cause a significant impact on the ability of greater horseshoe bats to use the site. Atkins provided an extensive survey of bat activity around Conitor Quarry and found evidence of possibly 10 species of bat.

As listed in the 2007 Abbotskerswell Biodiversity Audit, ancient woodland indicator species that are present at Conitor Copse include field maple, moschatel, wild garlic, wood sedge, pignut, scaly male fern, narrow buckler-fern, spindle, wood spurge, woodruff, English bluebell, holly, stinking iris, yellow archangel, hairy woodrush, wood millet, three-nerved sandwort, early-purple orchid, hart's-tongue fern, soft shield-fern, primrose, field rose, sanicle and guelder-rose.

South of NA3

The site falls within a strategic flyway for greater horseshoe bats as identified in the South Hams SAC greater horseshoe bat consultation zone planning guidance. A series of bat surveys are required as outlined in the guidance. If planning permission is granted, findings from the surveys should be taken into account when implementing mitigation measures such as maintaining and enhancing hedgerows and preventing disturbance from artificial lighting.

At least one curlew 250m buffer zone (breeding territory) falls within this site. If development is granted then hedges, scrub and grassland should be maintained within the buffer zone, along with appropriate management. If this is not possible, the four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed as outlined in the Wildlife and development guidance note for curlews.

Caravan Storage at Linden Lea:

We support the TDC comments regarding the high likelihood of Priority Habitats and Species and mitigation required.

Kingskerswell:

Zig Zag Quarry - 9.61 ha of which 1.61 may be developable 74-96 homes

The area shown needs surveying for wildlife that is specific to this sort of old quarry area. Decisions should be based on whether mitigation is possible. It should be possible to retain corridors to Milber and Ben Stedhams Woods through land and woodland to the north of the quarry.

Kingsteignton Overview:

Land East of Rydon

The UWS Limestone grassland (with Pyramidal Orchids) on land to the north-east of the site needs to be surveyed and connected to other sites if development takes place.

Land off Hackney Lane

Hackney Marshes LNR would need to be strengthened and enlarged, especially ensuring connectivity with the lower Teign Estuary.

Chapter 5 Housing options in the coastal towns.

The amount of high quality agricultural land threatened by development in the Dawlish area is very significant. Teignbridge has very little Grade 1 land and the development of a further 38 ha significantly reduces our ability to produce local vegetables for local consumption – which we all know is vital to us surviving the climate and ecological emergencies.

Dawlish Countryside Park is becoming a very good wildlife site. It needs to be well-connected to, **and through**, any development in that area.

In the Dawlish area over 100 ha of Grade 1 Agricultural land is at risk of development - this is deeply worrying!

Dawlish North:

Agriculture:

Teignbridge has very little Grade 1 land and the development of a further 39 ha significantly reduces our ability to produce local vegetables for local consumption – which we all know is vital to us surviving the climate and ecological emergencies. The possible loss of 39 ha of Grade 1 land is deeply worrying.

Ecology:

Providing wide, safe connections so that wildlife isn't isolated by development is crucial.

Langdon Hospital

Agriculture: Teignbridge has very little Grade 1 land and the development of a further 54 ha significantly reduces our ability to produce local vegetables for local consumption – which we all know is vital to us surviving the climate and ecological emergencies. The possible loss of 54 ha of Grade 1 and Grade 2 agricultural land is deeply worrying.

Ecology:

Providing wide, safe connections so that wildlife isn't isolated by development is crucial.

Land at Warren Farm: 9.22 ha Grade 1 land

Agriculture:

Teignbridge has very little Grade 1 land and the development of a further 9.2 ha reduces our ability to produce local vegetables for local consumption – which we all know is vital to us surviving the climate and ecological emergencies.

Ecology:

Providing wide, safe connections so that wildlife isn't isolated by development is crucial. In particular a wide area must be retained for the connection of coastal wildlife – which has different needs to inland wildlife.

Land at Teignmouth Road : 20.1 ha of Grade 2 land of which 10.3 ha is developable.

This land is an important buffer between the settlements of Dawlish and Holcombe for both wildlife and people. It's proximity to Unconfirmed Wildlife Sites means that their surveying before the Local Plan progresses further is vital!

Redundant Listed Buildings

Redevelopment of these buildings within legal restraints will be very challenging and needs many conditions to protect the 6 species of bats using the building as roosts.

Teignmouth:

Land at Buddleford Farm:

This land needs proper surveying before any decisions are taken.

Chapter 6: Options in Rural Towns – Ashburton and Bovey Tracey

Ashburton Dolbeare Road: 29 ha 250 houses and/or possible employment use.

This would be a big development for a small town and 250 houses may not be needed, however more of the site should be set aside for wildlife and people.

A green bridge would help to connect people and wildlife to the town and other habitats.

Bovey Tracey:

Bovey Tracey Golf Centre 28.4 ha 200-300 houses

This large site may still harbour areas of MG5 grassland or similar, and should be properly surveyed before becoming a Local Plan site.

Bradley Bends:

This is close to many sensitive sites and both the site and neighbouring areas require surveying before any decision is made.

Depot South of Pottery Road:

Any development here should include a wide corridor, linking the woodland and Blue Waters Pond with TDC's Pottery Pond, which is on the north side of the road.

Chapter 7 Housing Options on the Edge of Exeter: Exminster, Ide and Whitestone Parishes.

Peamore: 75 ha 933 houses

Ecology: This very large site has many protected species, habitats and close proximity to highly protected areas.

Agriculture: This is high grade land which is capable of producing large amounts of food for the local population.

Markham's Farm 32.7 ha 727 houses

This large site would need particularly good 'pocket parks' and wildlife corridors.

Atwell's Farm 39 ha of which 10 ha developable 200-250 houses

This large site would need particularly good 'pocket parks' and wildlife corridors.

Chapter 8.1: Housing Site Options for Villages (A-E)

Abbotskerswell:

Land at Manor Road - 3.61 ha of which 3.01 ha may be developable, 36-54 houses

A wide buffer strip should be maintained either side of the stream and all species-rich hedgerows should be kept and enhanced.

The site falls within a strategic flyway for greater horseshoe bats as identified in the South Hams SAC greater horseshoe bat consultation zone planning guidance. A series of bat surveys are required as outlined in the guidance. If planning permission is granted, findings from the surveys should be taken into account when implementing mitigation measures such as maintaining and enhancing hedgerows and preventing disturbance from artificial lighting.

This site should be surveyed for the presence of breeding circl buntings, as it is very close to a 250m buffer zone (breeding territory). If they are present, hedges, scrub and grassland should be maintained, along with appropriate management. If this is not possible, the four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed as outlined in the Wildlife and development guidance note for circl buntings.

Orchards Lane - 0.3 ha, all of which may be developable, 6-9 houses

This is the site of a traditional orchard, which is a priority habitat and supports a wide diversity of wildlife. As such, we ask that it should not be developed. If planning permission is granted, we ask that any remnant orchard trees should be maintained and that standard fruit trees should be planted wherever there are opportunities to do so.

This site should be surveyed for the presence of breeding circl buntings, as it is very close to a 250m buffer zone (breeding territory). If present, hedges, scrub and grassland should be maintained, along with appropriate management. If this is not possible, the four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed as outlined in the Wildlife and development guidance note for circl buntings.

Plum Tree Cottage - 0.61 ha of which 0.27 ha may be developable, 5-8 houses

Further surveys are required to ascertain if this is the site of a traditional orchard. If so, we ask that it should not be developed, as traditional orchards are a priority habitat and support a wide diversity of wildlife. If planning permission is granted, we ask that any remnant orchard trees should be maintained and that any tree planting should be with standard fruit trees. We also ask that all that species-rich hedgerows should be maintained and enhanced.

Ancient woodland at Grange Copse and Ladywell Wood CWS should be surveyed before planning permission is granted due to their proximity to the site.

At least one curlew 250m buffer zone (breeding territory) falls within this site. If development is granted permission, hedges, scrub and grassland should be maintained within the buffer zone, along with appropriate management. If this is not possible, the four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed as outlined in the Wildlife and development guidance note for curlews.

The Butcher's Arms - 0.58 ha of which 0.54 ha is developable, 9-13 houses

At least one curlew 250m buffer zone (breeding territory) falls within this site. If development is granted permission, hedges, scrub and grassland should be maintained within the buffer zone, along with appropriate management. If this is not possible, the four steps of the mitigation hierarchy (avoid, mitigate, compensate, enhance) should be followed as outlined in the Wildlife and development guidance note for curlews.

Ancient woodland at Grange Copse and Ladywell Wood CWS should be surveyed before planning permission is granted due to their proximity to the site.

There is anecdotal evidence that the area suffered from extensive flooding in 2020.

Bishopsteignton - it is estimated that 150 more houses are needed (the approx total number that would fit into these sites is 95).

Land south of Forder Lane - 4.17 ha of which 4.11 ha could be developed - 30-40 houses

A green field site within the S Hams SAC, the Exe Estuary SPA and the Dawlish Warren SAC, which may be an important corridor for several protected species. An ecological appraisal is needed. Space would need to be found for the 10% 'uplift' which would have to include buffering hedgerows, protecting trees and bat-friendly lighting.

Bishops Combe - 1.25 ha of which 1.2 ha is developable, 19-29 houses.

A green field site within the S Hams SAC, the Exe Estuary SPA and the Dawlish Warren SAC, which may be an important corridor for several protected species. An ecological appraisal is needed. Space would need to be found for the 10% 'uplift' which would have to include buffering hedgerows, protecting trees and bat-friendly lighting.

Bakers Yard - 1.23 ha of which 0.84 ha is developable, 13-20 houses.

A redundant farm/nursery yard which may be used by barn owls within the S Hams SAC, the Exe Estuary SPA and the Dawlish Warren SAC, which may be an important corridor for several protected species. An ecological appraisal is needed. Space would need to be found for the 10% 'uplift' which would have to include protecting trees and bat-friendly lighting.

High Elms - 0.41 ha of which 0.35 ha is developable, 4-7 houses.

Land attached to an existing house within the S Hams SAC, the Exe Estuary SPA and the Dawlish Warren SAC, which may be an important corridor for several protected species. An ecological appraisal is needed. Space would need to be found for the 10% 'uplift' which would have to include buffering hedgerows, protecting trees and bat-friendly lighting.

Broadhempston

Land north of Ashwick Court, Land west of Ashwick Court and land Southwest of Stoop Cross. Up to 72 houses are possible, but only 12 are required.

The closeness of the CWS Great Crested Newt Pond and Curlew Buntings makes these especially sensitive sites, requiring careful wildlife surveying before any decision is made on development. If they are developed, wide corridors, suitable for **all** of the protected species, would need to be designed into the schemes - and created **before** development took place.

Broadhempston is the Teignbridge Parish which still has the largest number of village orchards, so any mitigation should strengthen the veteran orchards and plant new **standard** (eg tall fruit tree) orchards. Orchard

habitats are arguably the best for a wide range of biodiversity, with the great advantage of relatively quickly developing 'veteran tree' habitats - in 30 years compared with 200 years for an oak tree.

The land north of Ashwick Court may be the preferred choice, but would still need considerable mitigation.

Chudleigh Knighton: (TDC calculates that 45 may be required)

Land to the rear of Apple Tree Close: up to 50 homes could be built.

This site is adjacent to Chudleigh Knighton SSSI and its impact on the SSSI would be unacceptable. Any development would require a strip of dense scrub (to be planted before development was started) that was at least 30 metres deep. This would obviously reduce the number of houses that could be accommodated.

Tollgate Farm 1.5 ha 31 houses.

This site is more suitable than the previous one, but still needs further ecological surveying. Any mitigation should include planting another traditional **standard** orchard. Orchard habitats are arguably the best for a wide range of biodiversity, with the great advantage of relatively quickly developing 'veteran tree' habitats - in 30 years compared with 200 years for an oak tree.

Denbury (TDC calculates that 10 houses may be required)

Denbury Glebe 15 houses

The site needs further surveying - particularly for species-rich grassland, as it is not possible to move or re-create this habitat.

Land east of East Street: 1.9 ha developable for 10-20 houses

Land south of the Union Inn: 0.8 ha developable 16 homes

Land at Denbury Down Lane: 1.04 ha and 19 possible houses

Subject to ecological surveying, this site would appear to be the most suitable one of the four.

Doddiscombsleigh (TDC calculates that 10 houses may be required)

Land at Springfield Farm: 1.44 ha developable 10-20 possible houses

This site appears to be relatively low in biodiversity compared with much of the Teign Valley. A Sustainable Drainage System is likely to be needed to reduce flood risks caused by the development which could affect land downstream. This could also be managed as a habitat for freshwater wildlife.

East Ogwell

Mill Lane

The land falls within a strategic flyway for greater horseshoe bats as designated in the South Hams SAC greater horseshoe bat consultation zone planning guidance. This particular flyway is associated with the roost at Conitor Quarry. A series of bat surveys are required as outlined in the guidance. If planning permission is granted, findings from the surveys should be taken into account when implementing mitigation measures such as maintaining and enhancing hedgerows and preventing disturbance from artificial lighting.

Exminster (TDC calculates that 260 houses may be required)

Milbury Barton

Lack of current and planned local school capacity means that it is possible that only retirement homes will be built - although there do not appear to be facilities for older people.

The site requirements listed are acceptable.

Exminster West 22.6 ha of which 11.5 may be developable, 255 houses.

Lack of current and planned local school capacity means that it is possible that only retirement homes will be built - although there do not appear to be facilities for older people.

Large areas of potential open space might be available here on the steep land and should be used to provide habitats for wildlife (in particular Cirl Buntings) and people. It is very encouraging to read that 'If this site were developed, substantial areas of Cirl Bunting habitat must be established within 2km before the existing habitat is damaged.' Although this should, of course, be the norm.

Sentry's Farm - a small site with a possible 21 houses.

Lack of current and planned local school capacity means that it is possible that only retirement homes will be built - although there do not appear to be facilities for older people.

It's probable high wildlife value to both Cirl Buntings and SPA suggests that it should not be developed.

Sannerville Chase - a small site with a possibility of 8 houses

Lack of current and planned local school capacity means that it is possible that only retirement homes will be built - although there do not appear to be facilities for older people.

Probable Cirl Buntings would require nesting habitat and good feeding areas close by.

Land to the SSE of Exminster House - a small site with possibly 17 houses.

Lack of current and planned local school capacity means that it is possible that only retirement homes will be built - although there do not appear to be facilities for older people.

Probable Cirl Buntings would require nesting habitat and good feeding areas close by.

Since this is currently amenity space, developing it would be unwise.

Chapter 8.2 Villages I-Z

Kenn and Kennford - requires approx 20 houses.

Four sites:

Land opposite Exeter Court Hotel 18.5 ha developable 220-330 houses

Land adjacent to Frank Aller 8.2 ha and 6.4 ha developable 76-114 houses.

Lamacroft Farm

East High Street

These are each clearly much larger than the villages need, they could result in unnecessary development and the destruction and loss of habitat and wildlife - so should not be developed.

St Andrew's Close Kenn

If this site is developed then the stream should be properly buffered and enhanced as a wildlife corridor.

Liverton - requires 50 houses

Land on the north side of Old Liverton Road

This site should not be developed because of its role as a corridor - there are no alternatives.

Starcross - requires 60 houses.

Staplake Road - 0.9 ha 10-20 homes and land at Brickyard Lane 2.2 ha 27-40 houses.

Both these sites have important habitat restraints - there are relatively high populations of birds such as Skylarks and Yellowhammers here - both on the UK Red List. In addition local people, including our ACT Wildlife Wardens) have observed that the sites are used by significant numbers of waterfowl at high tide and the sites are very close to the Exe Estuary SPA. Bats, glow worms and barn owls are all seen at dusk. The area is both an important habitat and an important corridor and should not be developed.

Chapter 9 Employment Site Options:

Former BCT site at Heathfield (brownfield site) - 4.8 ha

Ecology: This is a County Wildlife Site because of the rare plant Pennyroyal. If the site is developed, ACT would support the Biodiversity Officer's comments - '**Substantial compensation is likely to be required for loss of the Pennyroyal, the CWS, the other rare plants and the seed bank. This should include creation of a larger area of similar habitat nearby (on similar soils, with similar hydrology), using the site's sward, topsoil and seedbank, with ongoing management to encourage the target species. The compensation site should then be gifted to a wildlife conservation body together with a commuted sum to cover ongoing management in perpetuity. Prior to any works on-site, full survey will be required, with key species identified and propagated for later introduction to the receptor site. Mitigation and compensation will be needed for impacts on protected species including non-SAC bats, dormice, reptiles and others. Site also within the South Hams SAC Landscape Connectivity Zone and close to the edge of the SAC Sustenance Zone.**'

East Of Liverton Business Park - 6.68 ha of which 5.4 ha may be developable.

This site appears to be less ecologically sensitive than most and could provide employment land and enhanced brookside and hedgerow habitats for wildlife and people.

Ilford Park, Drumbridges - 46 ha of which 25-30 ha may be developable.

Ecology: Careful planning detail is needed to ensure that development here doesn't impact the Stover SSSI; lighting needs to be reduced for bat and other nocturnal wildlife.

Forestry: The loss of forestry land is bad news for climate change; an equivalent area should be planted.

North of Forches Cross - 16.99 ha of which 6.9 ha may be developable.

A green corridor including the Blatchford Brook could help wildlife. Opportunities for arable crops to be grown to benefit farmland birds such as Cirl Buntings should include a long-term contract with adequate compensation.

Southwest Chudleigh Knighton - 0.58 ha

This may be an important corridor for bats and other wildlife and careful planning would be necessary to combine employment use with wildlife use.

Blatchford Farm - 23.7 ha or which 10 ha may be developable.

Mitigation should include a wide corridor that follows the course of the Blatchford Brook as well as other wildlife (bat) corridors..

There is no mention of flooding - does it not flood in very wet weather?

Horse mills Field, Kingsteignton - 1.7 ha

Because this small site is such an important part of the SAC, keeping its flyways useable in an employment setting would be difficult, so it should not be developed.

Ruby Farm - 20.5 ha of which all is developable.

Hedgerows and trees on this large site should be retained and buffered as wildlife corridors.

Kingskerswell Road, Decoy - 31.8 ha of which 6.5 ha is developable.

If approximately 25 ha of this area is used as a Country Park with good habitat creation and corridors linking it with Decoy Country Park, corridors protecting the Aller Brook and the creation of arable weed land for farmland birds to feed on in winter, then the development would be acceptable. The Aller Brook has historically been vulnerable to pollution from industry and this should be considered.

East of Old Newton Road, Kingskerwell - 19.59 ha of which 2.8 ha may be developable.

The high flood risk area should be improved for a wide variety of wildlife to use.

Zigzag quarry, Kingskerswell - 9.61 ha of which 1.61 may be developable.

The area shown needs surveying for wildlife that is specific to this sort of old quarry area. Decisions should be based on whether mitigation is possible. It should be possible to retain corridors to Milber and Ben Stedhams Woods through land and woodland to the north of the quarry.

Buttlands Industrial Estate, iplepen - 0.63 ha all of which may be developable.

Additional surveys are needed. If passed for development then hedges should be retained and habitats buffered.

West Exe Business Park, Peamore - 18 ha which may all be developable.

Corridors need to be created by planting hedges and trees.

Brown's Farm, Splatford - 9.45 ha of which 5.18 ha may be developable.

The steep areas which are unsuitable for development should be retained, and if necessary, enhanced. The stream should also be buffered for wildlife.

Opposite Exeter Court Hotel - 19.2 ha of which 18.46 ha may be developable.

Strong wildlife corridors through the site would be needed, retaining the hedges and buffering the watercourse. No mention is made of the land quality, but it may be of a high grade, in which case it should not be developed.

Dolbeare Road, Ashburton - 28.94 ha of which 27 ha may be developable.

This is a big development site for a small town and it may not all be needed, however the area is rich in wildlife and more of the site should be set aside to mitigate for loss of habitat. A green bridge would help to connect people and wildlife to the town and other habitats.

Langdon Business Park, Dawlish - 3 ha of which 2.3 ha may be developable.

Surveys should be carried out for Protected species and Habitats (if they haven't already). Hedge and stream corridors should be strengthened.

Measures taken because it is a Critical Drainage Area should also attempt to provide additional wildlife habitats.

Harcombe Farm, Chudleigh - 1.85 ha all of which may be developable.

This field is adjacent to the A38 Harcombe Special Verge, which is one of the best calcareous habitats in the District - it has at least 7 species of orchids and around 100 other plant species. The field verge is species rich with many orchids and should be surveyed as it is very vulnerable to damage. This hedge and others should be retained, buffered and strengthened as wildlife corridors.