



**Devon Countryside Access Forum
c/o Public Rights of Way team
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Spatial Planning Team
Teignbridge District Council
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21 January 2022

Dear Sir/Madam

Teignbridge Draft Local Plan 2020-2040 (Part 3)

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CRoW Act). Its statutory remit is to give independent advice “as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area...” Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice, and this includes county and district councils.

The DCAF currently has fifteen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.

The Devon Countryside Access Forum held a meeting on 18 January 2022 and agreed to submit the following comments. Its response is confined to the renewable energy options for development.

Renewable Energy - Wind

The Devon Countryside Access Forum welcomes the wind farm section of the Local Plan Document prepared by Teignbridge District Council. The DCAF advises that a statement should be included to the effect that the importance of existing and any planned rights of way and recreational trails will be taken into consideration. For example, the plan for **Holcombe Burnell, Wind Site 3**, does not show the bridleway (Holcombe Burnell Bridleway 8) that runs through the site or include it in the site assessment.

In addition, the existence of access land under the Countryside and Rights of Way Act 2000 and any coastal access land under the Marine and Coastal Access Act 2009 should be identified as part of the designation process. Some access land may have additional landscape or wildlife designations and is available for people to walk across.

The Public Rights of Way interactive map data on www.devon.gov.uk/prow should be used as part of the requirements for the methodology and scoring assumptions.

An additional matter not included in the checklist is area of blade shadow, a particular concern of horse riders. The British Horse Society refers to this in its wind turbine guidance to planners and developers
<https://www.bhs.org.uk/~media/documents/access/access-leaflets/wind-turbines-planners.ashx?la=en>

The DCAF recommends that developers should be asked to give high priority to the safety of rights of way and access users during construction periods, with an emphasis on warning notices and an appropriate code of conduct.

As part of the consultation process the DCAF advises that access user organisations, such as the British Horse Society, Ramblers' and Sustrans, at both local and national level should be specified in any stakeholder engagement list drawn up between Teignbridge District Council and potential developers.

Renewable Energy – Solar

The Devon Countryside Access Forum advises that the existence of public rights of way, trails and access land should be part of the consideration criteria. The statement on Recreation 3.29 below should be amended to state"existing designated open space, *public rights of way and trails* or proposals for the same....."

Recreation

3.29 Dependent upon the location of renewable energy development in relation to existing designated open space, public footpaths and cycle ways or proposals for the same; opportunities to incorporate improvements for such facilities may be sought through the provisions of Local Plan Policy DW9: Natural Infrastructure, other Design and Wellbeing policies and defined Active Travel routes contained in the Local Plan.

The DCAF advises that the location of any solar farm should not detract from the attractiveness and enjoyment of any public right of way or trail. This consideration should be included in the policy statement on recreation.

The DCAF recommends that developers should be asked to give high priority to the safety of rights of way and access users during construction periods, with an emphasis on warning notices and an appropriate code of conduct.

As part of the consultation process the DCAF advises that access user organisations, such as the British Horse Society, Ramblers' and Sustrans, at both local and national level, should be specified in any stakeholder engagement list drawn up between Teignbridge District Council and potential developers. The BHS has a policy statement on solar farms.

<https://www.bhs.org.uk/~media/documents/access/access-leaflets/solar-farms.ashx?la=en>

This letter constitutes formal advice from the Devon Countryside Access Forum. Teignbridge District Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this Forum in carrying out its functions.

The Forum would welcome feedback on its comments.

Yours faithfully



Hilary Winter
Forum Officer

*Letter sent on behalf of the Devon Countryside Access Forum
Chair: Sarah Slade
Vic Chair: Chris Cole*