

Briefing Note: Application's Non-Compliance with Braunton Parish Neighbourhood Plan Built Environment Policies

BE4 Adoption of Appropriately Scaled Renewable Energy

Section 1.iii) The proposal is not compliant with this policy point as the unacceptable impacts cannot be mitigated in respect of

- a) Properties in close proximity to the onshore cable route will be severely effected by construction activities for at least 24 months particularly those that are adjacent to the proposed construction compounds
- b) Potentially the local amenity as listed in the policy will be adversely effected for both property dwellers and visitors to the area
- c) Enjoyment of public rights of way for both local residents and visitors will be severely curtailed as the proposed construction activities across the route will be highly visible
- d) Public safety along the proposed route during construction cannot be guaranteed and there is very little detail as to how this would be addressed

BE9 Vehicle Movements Assessment

This policy requires evidence of the arrangements for vehicular access into, within and from construction sites to mitigate impact on the immediate local road network. The applicant's Chapter 19: Traffic and Transport and Appendix 19.A: Transport Assessment details the projected HGV and LGV movements for each proposed site access but does not evidence how these traffic movements will be managed. Nor does it address the impact that the additional construction traffic will have on the immediate local road network e.g access to Saunton Sands carpark.

BE10 Improving Transport Accessibility and Connectivity

Braunton village has significant constraints because of its geographic location on the local road network. The A361/B3232 junction in the centre of the village is a critical pinch point in respect of traffic flow year round. The proposed additionality of up to 92 HGV into this road network daily for a significant period of time will have a major adverse impact.

In the applicant's Chapter 19 the only consideration has been that of delay in journey times which they consider to be insignificant. Traffic delays already push traffic into small back roads so as to by pass the main junction. There has been no consideration of this potential impact on traffic movement and safety.

Nor has there been any consideration of the practicalities of introducing 16.5m HGVs into the village centre particularly turning into and out of Caen Street. The narrowness of the road and pavement means that these vehicles will be in extremely close proximity to pedestrians, cyclists and mobility scooters.

BE12 Protection and Improvement of Air Quality

Section 3 requires compliance with North Devon and Torridge Council's Air Quality Supplementary Planning document and provision of an Air Quality Impact Assessment. The applicant's Chapter 13 Air Quality cannot be described as a full impact assessment because it fails to provide the required detailed measurements of emissions stated in the subsections 3.i) and 3.ii) specifically particulate matter PM10 and PM2.5. The applicant's analysis should have established a baseline reading pre-construction in readiness for onward monitoring during the construction period to ensure no deterioration as required in the policy. This would also provide a benchmark for the effectiveness of their yet to be detailed mitigation activities.

In respect of nitrogen dioxide NO₂ the applicant has used the data as detailed in *Table 13.24 Annual mean NO₂ monitoring undertaken by North Devon District Council* which the applicant acknowledges is incomplete and "should be treated with caution". Having said this the applicant then uses it to conclude that there is a declining trend, that the impact is not significant, and no mitigation is required.

BE13 Protect and Promote Dark Skies

Section 1: This policy requires that planning proposals avoid the introduction of light into the Parish's designated landscape. The applicant's choice of route means that this proposal cannot avoid the introduction of light therefore the applicant's proposed route is not acceptable.

Section 2 and 3: Where external lighting is deemed essential it must be designed to minimise light pollution and the use of unscreened lighting cannot be used. The policy requires a Light Impact Assessment which the applicant has not provided, nor are there any lighting design details. Given this lack of detail it is not clear as to whether the policy criteria will be met.

It is noted from other documentation that it is probable that the external lighting will be around the 5 construction compounds situated along the route. As has been previously stated in respect of Natural Environment policy NE2 the proposed cable construction route and its compounds are in very close proximity to known bat sites.