



Strategic Environmental Assessment for the Modbury Neighbourhood Plan

**Environmental Report to accompany the submission
version of the Neighbourhood Plan**

Modbury Neighbourhood Plan Steering Group

December 2019

Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment (SEA)?

A strategic environmental assessment (SEA) has been undertaken to inform the Modbury Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Modbury Neighbourhood Plan?

The Modbury Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Plymouth and South West Devon Joint Local Plan (JLP).

The Neighbourhood Plan was submitted to South Hams District Council in autumn 2019.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2019), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Modbury Neighbourhood Plan and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the Modbury Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Modbury Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Modbury Neighbourhood Plan;
- The likely significant environmental effects of the Modbury Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Modbury Neighbourhood Plan; and
- The next steps for the Modbury Neighbourhood Plan and accompanying SEA process.

Assessment of reasonable alternatives for the Modbury Neighbourhood Plan

Sites allocated in Modbury through the Plymouth and South West Devon Joint Local Plan

The Plymouth and South West Devon JLP, which was adopted in March 2019, allocates three sites in Modbury for housing and employment. These sites are as follows:

- West of Palm Cross: 92 homes; 1,900 sq.m. employment floorspace
- Pennpark: 40 homes
- West of Barracks Road: 40 homes

Consultation undertaken to date for the Modbury Neighbourhood Plan has highlighted that there is a desire amongst the community to consider alternative sites to those allocated in the JLP. This is in part due to a perception amongst residents that focusing housing provision on the three sites to the west of the town is not the most appropriate spatial strategy for delivering growth in Modbury in the period to 2034.

To date, construction at two of the three sites allocated through the JLP has begun, and only development at the Pennpark site has not progressed to date. In light of this, only alternative options for the Pennpark allocation would be reasonable to assess for the Neighbourhood Plan.

Following discussions, South Hams District Council has advised the Neighbourhood Group that the JLP allocation of 40 homes at Pennpark is not a strategic proposal. As such, if seen fit, the Neighbourhood Plan can substitute the site for an alternative site, providing there is clear evidence and support for the change.

Neighbourhood Plan site assessment and initial shortlisting of sites

During the earlier stages of the Neighbourhood Plan's development, there was a recognition that the Neighbourhood Plan would potentially need to allocate sites for new development. In light of this, the Neighbourhood Plan Steering Group undertook an assessment of the various available sites in the vicinity of the town.

This considered the 16 sites previously assessed through the South Hams and West Devon Strategic Housing Land Availability Assessment (SHLAA)¹. These sites were assessed against a range of criteria relating to suitability, availability and achievability. Subsequent to this process, nine sites were shortlisted as being appropriate for further consideration as potential allocations for the Neighbourhood Plan.

These sites are as follows:

- Site A: Land to the North of Dartmouth Road (SHLAA site reference SH-35-04)
- Site B: Land to the South of Dartmouth Road (half of SHLAA site reference SH-35-05a)
- Site C: East of Ayleston Park (half of SHLAA site reference SH-35-05a)
- Site D: Scalders Lane (SHLAA site reference SH-35-01)
- Site E: Oodles, South of Poundwell Street and Car Park (RA2) (SHLAA site reference SH-35-09)
- Site F: Pennpark Farm (SHLAA site reference SH-35-14)
- Site G: Pennpark Farm (SHLAA site reference SH-35-13)
- Site H: West of Barracks Road (SHLAA site reference SH-35-03)
- Site I: Pennpark Farm (SHLAA site reference SH-35-12)

Assessment of the shortlisted sites through the SEA process

As discussed above, the Neighbourhood Plan Steering Group has sought to respond to consultation undertaken during earlier stages of the Neighbourhood Plan. This indicated a community desire for an alternative site to the JLP allocation at Pennpark to be considered for allocating through the Neighbourhood Plan.²

To support the consideration of the suitability of the above shortlisted sites for a potential allocation of this type in the Neighbourhood Plan, the SEA process has undertaken a separate appraisal of the key

¹ South Hams District Council & West Devon Borough Council (March 2017) Strategic Housing Land Availability Assessment

² The site allocated through the JLP at Pennpark incorporates sites F and G discussed above.

environmental constraints present at each of the relevant sites. This has considered the potential effects that may arise as a result of a housing development of 40 homes at these locations (reflecting the size of the JLP allocation at Pennpark).

In this context the sites have been considered in relation to the SEA Framework of objectives and decision-making questions developed during SEA scoping (Chapter 3 of the Environmental Report) and the baseline information. This SEA site assessment was undertaken separately to the site assessment undertaken by the Modbury Neighbourhood Plan Steering Group.

The sites assessed through the SEA process are the same as the shortlisted sites above, with the exception of the following:

- Site F and G have been combined to reflect the full extent of the site allocated through the JLP for 40 homes.
- The JLP allocation at West of Barracks Road (Site H) has not been considered given the site is now under construction. As such, it is no longer appropriate to consider as a potential allocation for the purposes of the Neighbourhood Plan.

The locations of the seven sites assessed through the SEA process are presented in Figure NTS1 below.

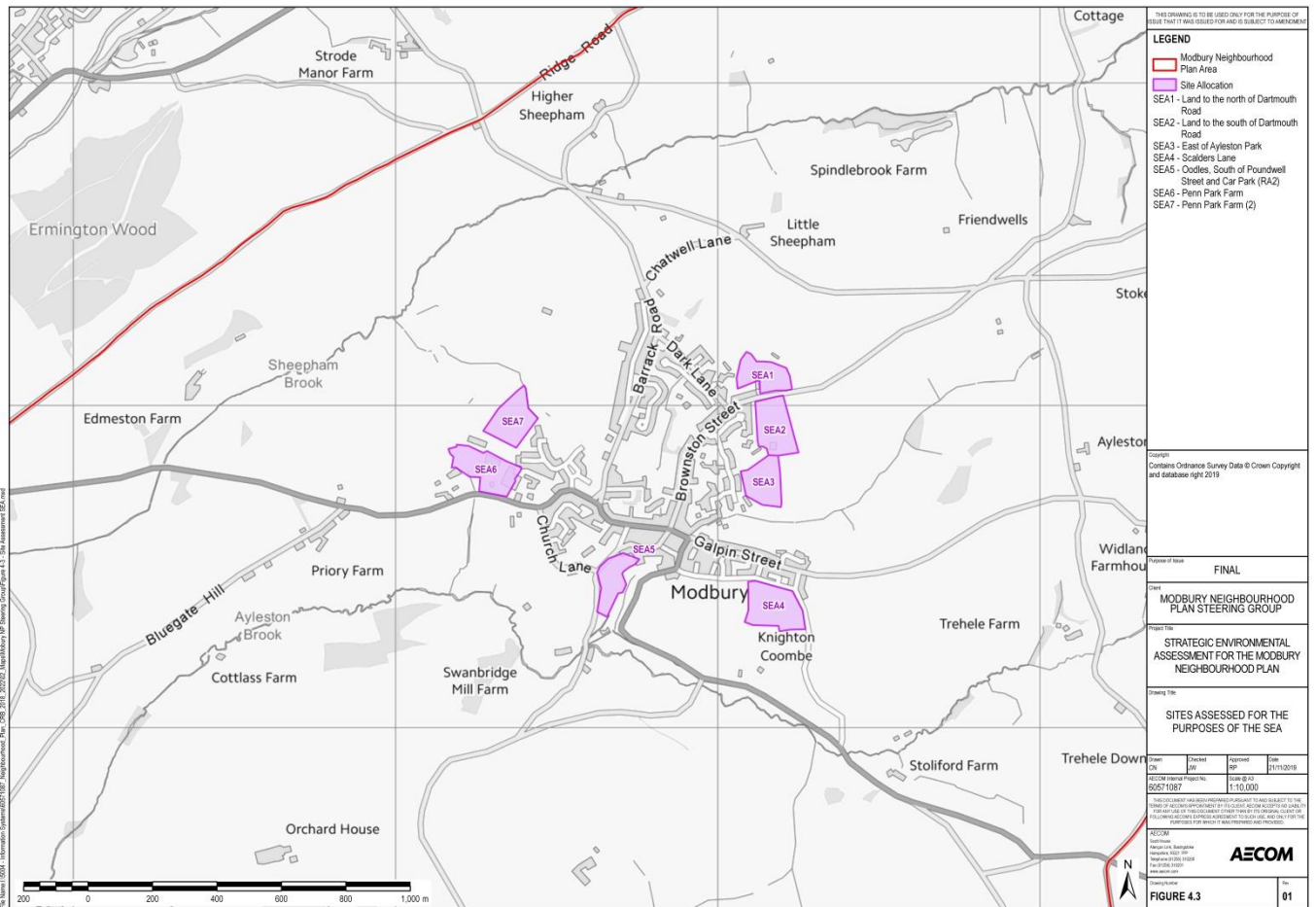


Figure NTS1: Sites assessed as site options through the SEA

Tables 4.1 to 4.7 in the main body of the Environmental Report present the findings of the assessment. A summary of the appraisal findings is presented below:

Table NTS1: Summary of SEA site appraisal findings

Site	Biodiversity and Geodiversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population and Community	Health and Wellbeing	Transport	
SEA1	Yellow	Yellow	Blue	Yellow	Blue	Green	Green	Blue	
SEA2	Yellow	Yellow	Blue	Red	Blue	Green	Green	Blue	
SEA3	Yellow	Yellow	Blue	Red	Blue	Green	Green	Green	
SEA4	Yellow	Yellow	Red	Blue	Blue	Green	Green	Blue	
SEA5	Yellow	Red	Red	Red	Green	Green	Green	Green	
SEA6	Yellow	Yellow	Blue	Yellow	Blue	Green	Green	Blue	
SEA7	Yellow	Yellow	Red	Blue	Blue	Green	Green	Blue	
Key									
Likely adverse effect (without mitigation measures)					Red	Likely positive effect			Green
Neutral/no effect					Yellow	Uncertain effects			Blue

Following consideration of these sites, the submission version of the Neighbourhood Plan allocates 40 homes on the East of Ayleston Park site (site SEA3 considered above). This is in place of the site allocated at Pennpark through the South West Devon JLP (site SEA6).

The stated reasons for this are as follows:³

- Land in the east of the town is generally well contained in a valley which looks in towards the town rather than outwards to the surrounding countryside (as is broadly the case to the west).
- Allocation of the site has the capacity to link more directly to the town centre via both roads and footpaths, making for a more walkable and sustainable community.
- Allocation of the site is more likely to result in journeys on foot around the town, helping to sustain social contact and healthy lifestyles.
- Earlier planning permissions in Modbury had included conditions requiring that existing hedgebanks and trees in the landscape to the east of Ayleston Park be allowed to grow and mature, establishing a landscape context which can more effectively and successfully accommodate and integrate new development into its setting.
- The site would better related to the scale and character of the town and to the town centre in particular.
- The site will deliver an increased number of affordable homes than have been achieved on other developments in Modbury. The JLP includes a target of 30% affordable homes on new housing sites of 11 dwellings or more. This is the target for Pennpark, which would mean that of the 40 homes proposed on the site only up to 12 might be affordable. Negotiations on the East of Ayleston Park site have resulted in a figure of 50%, which would lead to the delivery of 20 affordable homes.

Assessment of alternatives for the use of housing in the Neighbourhood Plan area

Following consultation with the local community, a further element in which the Neighbourhood Group was keen to explore was the issue of permanent and second homes and holiday letting. To consider this issue in more detail, and provide further sustainability context, the SEA process appraised two options, as follows:

³ Modbury Neighbourhood Plan Steering Group (August 2019) Modbury Neighbourhood Plan, The Case for the Site East of Ayleston Park

- Option A: Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in Modbury through introducing restrictions on the use of new housing; and
- Option B: Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.

The appraisal findings relating to the assessment of the above two options are presented in Table 4.9 of this Environmental Report.

Following consideration of this issue, the current submission version of the Neighbourhood Plan places a condition on open market housing that the houses should be occupied as a primary residence. This is given the proportion of second or holiday homes has recently seen significant increases in surrounding parishes (reflecting increased demand for such properties), and the perception that this trend, if extended to Modbury, has the potential to have a significant impact on the ability of local residents, their relatives and those with other local connections to rent or buy in the town. This proposed approach has also been supported through consultation events undertaken for the Neighbourhood Plan to date.

Assessment of the submission version of the Modbury Neighbourhood Plan

The submission version of the Modbury Neighbourhood Plan presents 14 planning policies for guiding development in the Neighbourhood Plan area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process assessed the policies put forward through the current version of the Modbury Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Biodiversity and Geodiversity;
- Climate Change;
- Landscape
- Historic Environment;
- Land, Soil and Water Resources;
- Population and Community;
- Health and Wellbeing; and
- Transportation.

The assessment has concluded that the current version of the Modbury Neighbourhood Plan is likely to lead to significant long term positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on providing new housing to meet local needs in an accessible location, the provision of new community facilities and infrastructure in the town, support for community vitality, the protection and enhancement of green infrastructure networks in the area and the protection and enhancement of the quality of the public realm and neighbourhood distinctiveness.

The allocation at East of Ayleston Park proposed through the Neighbourhood Plan has the potential to have impacts on the setting (but not the fabric) of features nationally designated for the historic environment. In addition, the proposed allocation, whilst not within the South Devon AONB, can be viewed from, and as such is in the setting of, the AONB. The policies of the Neighbourhood Plan however proactively respond to these constraints, including through having a close focus on protecting and enhancing landscape and townscape character, and on conserving and enhancing the setting and fabric of the historic environment. Taken together, the policies will help limit negative effects from new development resulting on the allocation on landscape/townscape character and on the setting of the historic environment, and promote longer term positive effects through securing enhancements to local distinctiveness. Overall therefore, no significant effects have been identified in relation to the 'Landscape' and 'Historic Environment' themes.

The Neighbourhood Plan facilitates the delivery of 40 homes on one greenfield site. This has the potential to lead to the loss of productive agricultural land in the Neighbourhood Plan area. However, given the greenfield development will not lead to the loss of areas of the Best and Most Versatile Agricultural Land in Modbury, impacts in relation to the 'Land, Soil and Water Resources' SEA theme are not likely to be significant.

In relation to the 'Climate Change' theme, no flood risk issues exist on the allocated site. In addition, the policies of the Neighbourhood Plan have a focus on addressing fluvial and surface water flood risk issues which provide an additional level of protection in relation to flood risk over and above the provisions of national and local policies. As such, it is considered that the Neighbourhood Plan will have overall positive effects in relation to climate change adaptation.

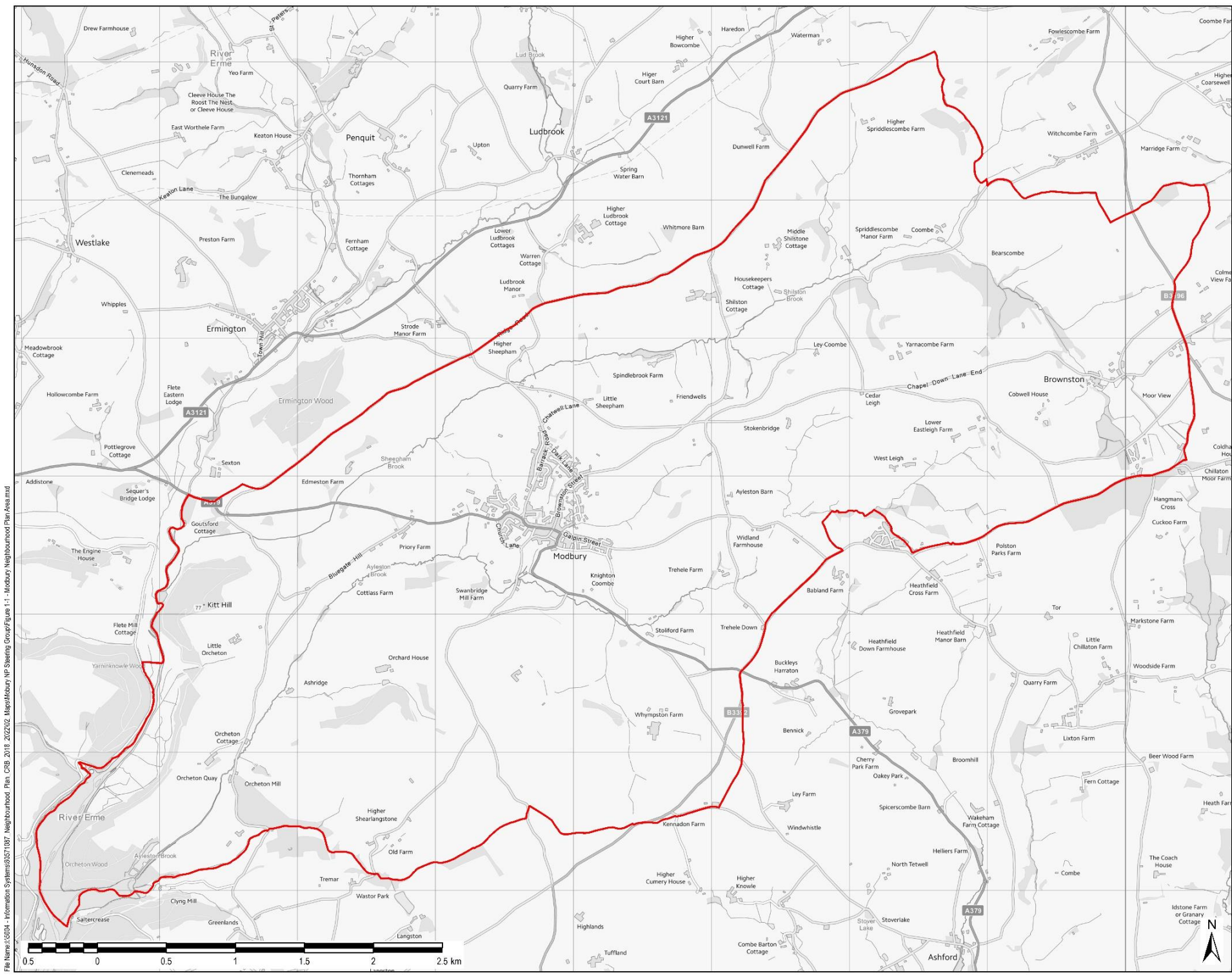
In terms of the 'Biodiversity and Geodiversity' and 'Transportation' themes, the Neighbourhood Plan will initiate a number of beneficial approaches. These are not though considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

Next steps

This Environmental Report accompanies the Modbury Neighbourhood Plan for submission to the Local Planning Authority, South Hams District Council, for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Plymouth and South West Devon Joint Local Plan.

If Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by South Hams District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Modbury Neighbourhood Plan will become part of the development plan for Modbury Parish.



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LEGEND

- Modbury Neighbourhood Plan Area

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Purpose of Issue **FINAL**

Client
MODBURY NEIGHBOURHOOD PLAN STEERING GROUP

Project Title
STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE MODBURY NEIGHBOURHOOD PLAN

Drawing Title
MODBURY NEIGHBOURHOOD PLAN AREA

Drawn CN	Checked JW	Approved RP	Date 17/08/2019
AFCOM Internal Project No. 60571087		Scale @ A3 1:25,000	

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Drawing Number **FIGURE 1.1** Rev **01**

File Name: 15204 - Information Systems\35571087_Neighbourhood_Plan_CS\B_2019_2022\02_Maps\Modbury_NP_Steering_Group\Figure 1.1 - Modbury_Neighbourhood_Plan_Area.mxd

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Modbury Parish's emerging Neighbourhood Plan.
- 1.2 The Modbury Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Plymouth and South West Devon Joint Local Plan.
- 1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to South Hams District Council later in 2019 and undergo a referendum in early 2020.
- 1.4 Key information relating to the Modbury Neighbourhood Plan is presented in Table 1.1.

Table 1.1: Key facts relating to the Modbury Neighbourhood Plan

Name of Responsible Authority	Modbury Parish Council
Title of Plan	Modbury Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Modbury Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Plymouth and South West Devon Joint Local Plan</p> <p>The Modbury Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.</p>
Timescale	To 2034
Area covered by the plan	The Modbury Neighbourhood Plan area covers the parish of Modbury in the South Hams, Devon (Figure 1.1).
Summary of content	The Modbury Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Ann Turner, Modbury Neighbourhood Plan Steering Group Email: annc.turner@hotmail.co.uk

SEA explained

- 1.5 Strategic Environmental Assessment (SEA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the Modbury Neighbourhood Plan seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive⁴. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.7 The Modbury Neighbourhood Plan has been screened in by South Hams District Council as requiring an SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.8 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
 1. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 2. A report (the 'Environmental Report') is published for alongside the Draft Plan (i.e. the proposed submission version of the Modbury Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

⁴ Directive 2001/42/EC

Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for Modbury Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory⁵ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁶	
What's the scope of the SEA?	What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.
	What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan. 	
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan. 	
What happens next?	<ul style="list-style-type: none"> The next steps for plan making / SEA process. 	

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

⁶ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Modbury Neighbourhood Plan

Local Plan context for the Neighbourhood Plan

- 2.1 The Modbury Parish Neighbourhood Plan is being prepared in the context of the Plymouth and South West Devon Joint Local Plan⁷ (JLP), which covers the period up until the year 2034. The JLP provides the broad policy framework and a long-term strategy to manage development, protect the environment, deliver infrastructure and promote sustainable communities within Plymouth and South West Devon.
- 2.2 The Neighbourhood Plan area is located within the ‘Thriving Towns and Villages’ Policy Area of the JLP. Along with the settlements of Bere Alston, Dartington, Heatherleigh, Lifton, North Tawton, Salcombe, Stokenham / Chillington and Yealmpton, Modbury is classified as a ‘Smaller Town and Key Village’ within the settlement hierarchy. Characterised by a level of services and amenities that can support the daily needs of a rural population, the JLP outlines that these settlements make an important contribution to the vitality and sustainability of the Thriving Towns and Villages Policy Area.
- 2.3 Policy TTV24 ‘Site Allocations in the Smaller Towns and Key Villages’ within the JLP outlines provisions for 172 new dwellings and 1,900 m² of employment floorspace for the Neighbourhood Plan area, to be delivered through three site allocations which are located to the west of Modbury, namely:
- West of Palm Cross, Modbury: mixed use development of 92 new dwellings and 1,900 m² of employment space (currently under construction);
 - Pennpark, Modbury: residential development of 40 new dwellings; and
 - West of Barracks Road, Modbury: residential development of 40 new dwellings (currently under construction).
- 2.4 Modbury Neighbourhood Plan Steering Group (on behalf of Modbury Parish Council) has undertaken several consultations with the local community, the results of which have indicated a preference for alternative proposals which could potentially deliver a more balanced and sustainable future for the town. In this regard, the Modbury Neighbourhood Plan is exploring the potential to substitute the site allocation on the ‘Land at Pennpark, Modbury’ in favour of an alternative site within the town. This is supported in principle by South Hams District Council providing that there is clear evidence and support for the change.
- 2.5 Neighbourhood plans will form part of the development plan for Plymouth and South West Devon, alongside, but not as a replacement for the JLP. The JLP seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in the South Hams District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

⁷ Plymouth City Council, West Devon Borough Council, South Hams District Council (2019): ‘Plymouth and South West Devon Joint Local Plan (JLP)’, [online] available to access via:
<<https://www.plymouth.gov.uk/plymouthandsouthwestdevonjointlocalplan/plymouthandsouthwestdevonjointlocalplanadoption>>
last accessed [19/09/19]

Vision, aims and objectives for the Neighbourhood Plan

2.6 The vision for the Modbury Neighbourhood Plan, which was developed during the earlier stages of plan development, is as follows



Modbury will seek to embrace the future without compromising its character as an historic market town. It will support a vibrant community living in a safe, sustainable environment. It will be a place where development is in keeping with the existing built form and surrounding landscape and managed to meet the needs of residents and visitors.

Vision for the Modbury Neighbourhood Plan



2.7 The vision for the Neighbourhood Plan is supported by 12 objectives, as follows:

- a) Maintain and enhance the historic character of Modbury through listed building and conservation area policies, the preservation of historic sites and buildings and appropriately scaled, phased and sympathetic development. Give high priority to upholding the guidelines laid out in the Modbury Village Design Statement so that all new development is harmonious with the existing built forms which characterise the town.
- b) Enhance the vibrancy of the commercial heart of the town and provide facilities to support increased local employment.
- c) Deliver sufficient new homes, including a range of sizes, types and tenures to meet the needs of local people as well as to contribute to the growth of the town.
- d) Ensure that all new development has sufficient off-street parking for all residents.
- e) Ensure that all new development meets the highest standards of energy efficiency and sustainable construction and takes account of other environmental factors such as landscape impact, flood risk, topography and biodiversity.
- f) Promote a local scheme to deliver community renewable energy.
- g) Retain and create new pedestrian and cycle routes through and around the town to reduce reliance on the motorcar and, in particular, provide improvements to pedestrian movements from the Palm Cross area to the Town Centre.
- h) Identify and safeguard or provide community spaces – buildings and open/greenspaces.
- i) Create a town square – that can be used by residents of all ages.
- j) Identify and safeguard or improve play provision to meet NPFA recommendations.
- k) Support a study being undertaken for a relief road for Modbury, respecting the sensitive landscape character of the AONB.
- l) Support a study being undertaken to identify how traffic flow and road safety might be improved around the town.

3. What is the scope of the SEA?

SEA Scoping Report

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁸ These authorities were consulted on the scope of the Modbury Neighbourhood Plan SEA for a period of five weeks, between September and October 2019.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England	
<i>Corine Dyke, Sustainable Development Team (email response received on 6th November 2019)</i>	
Chapter 3 Geodiversity and Biodiversity In paragraph 3.9 - Baseline Summary for European sites, you fail to identify the Tamar Estuaries Complex SPA and the Plymouth Sound and Estuaries SAC as relevant to the Modbury neighbourhood plan. The Modbury neighbourhood plan falls within the Zone of Influence of these two European sites and new housing and tourist development in the plan area is likely to have an in combination significant effect on these two sites. The HRA screening and Appropriate Assessment for the Neighbourhood as prepared by the LPA deals with this issue further but the issue should be identified in the SEA scoping report.	Comment noted. The baseline information and key sustainability issues have been updated accordingly. Biodiversity considerations (including potential impacts to European designated sites through plan proposals) are further discussed and appraised through the assessment of reasonable alternatives (Chapter 4) and the plan appraisal (Chapter 5).
Historic England	
<i>David Stuart, Historic Places Adviser (email response received on 4th November 2019)</i>	
Our interest in the Plan focuses on its intention to allocate sites for development. We have highlighted the issues associated with this aspiration in our previous responses to the Regulation 14 and subsequent consultations.	Comment noted.

⁸ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programme.’

Consultation response	How the response was considered and addressed
<p>The emphasis here is on the need for the significance of relevant heritage assets to be understood to provide evidence to inform the determination of whether the sites in question are suitable for development. In our previous responses we drew attention to our guidance on material considerations, some of which we are pleased to see reiterated in the Scoping Report.</p>	<p>Comment noted. The recommended guidance has provided an essential reference point during the SEA process. Heritage considerations are further discussed and appraised within the Environmental Report, specifically through the assessment of reasonable alternatives (Chapter 4) and the plan appraisal (Chapter 5).</p>
<p>We would draw attention to the absence of reference to our guidance on Site Allocations and encourage the inclusion of this as a desirable and relevant consideration. We would also draw attention to our just-issued guidance on preparing Statements of Significance which may be useful, and can be found via the following link - https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/</p>	<p>Comment noted. The recommended guidance has provided an essential reference point during the SEA process.</p>
<p>Otherwise, the only comments we would offer on the content of the Scoping Report is to reiterate, as on previous occasions, the helpfulness of summarising as part of the introduction the reasons why an SEA has been deemed necessary.</p>	<p>Comment noted. South Hams District Council have screened in the Neighbourhood Plan as requiring an SEA. This is due to the potential for significant environmental effects resulting from the plan given 1) the significant environmental constraints in the area, including the presence of the South Hams AONB, SSSIs, a rich historic environment resource and flood risk issues and 2) the plan seeking to allocate in the region of 40 homes.</p>
<p>Environment Agency <i>No response received</i></p>	

- 3.4 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

Key Sustainability Issues

Air Quality

- The 2018 ASR for South Hams and West Devon confirms that there are no AQMAs within the Neighbourhood Plan area.
- The 2013 Air Quality Action Plan for South Hams indicates that as the district grows, there is an increasing risk of air quality issues along the main trunk roads and junctions.
- Due to the absence of any significant air quality issues within the Neighbourhood Plan area, **the air quality theme has been scoped out for the purposes of the SEA process.**

Biodiversity and Geodiversity

- The 'Start Point to Plymouth South and Eddystone' SAC with Marine Components is located approximately 3km to the south of the parish (at its nearest point).

- The Neighbourhood Plan area also falls within the Zone of Influence of the Tamar Estuaries Complex SPA and the Plymouth Sound and Estuaries SAC.
- There are two SSSIs within and within proximity to the Neighbourhood Plan area, namely: Erme Estuary SSSI and Andrew's Wood SSSI.
- Most of the Neighbourhood Plan area overlaps with SSSI IRZ thresholds for residential, rural residential, and rural non-residential development types.
- Designated in May 2019 and partly overlapping with the SSSI, the Erme Estuary MCZ contains a wide variety of estuarine rocky habitats, intertidal rocks and mixed sediments.
- There are several CWS located within and within proximity to the Neighbourhood Plan area which support habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC).
- There are several BAP priority habitats located within and within proximity to the Neighbourhood Plan area, including areas of ancient and semi-natural woodland, lowland meadows and grasslands, and coastal / marine habitats associated with the Erme Estuary.

Climate Change

- Any increases in the built footprint of the Modbury Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in the Parish.
- The total CO₂ emissions per capita within South Hams are higher than regional and national totals and the overall percentage reduction of emissions within the Neighbourhood Plan area between 2005 and 2016 was similar to regional and national trends
- There are areas of land adjacent to the River Erme, Sheephams Brook and Ayleston Brook which are located within Flood Risk Zone 3, and as such, have a >1% chance of annually flooding.
- As stated within the SFRA, several properties in Modbury were impacted by summer and winter fluvial flooding events during 2012.
- There have been several historical surface water flooding events within Modbury. These have been generally caused by a combination of factors such as direct runoff following heavy rainfall and inadequate or blocked drainage systems.
- Some areas of high surface water flood risk (1 in 30-year extent) affect properties and roads in the town centre at Broad Street and Church Street.
- Modbury is within a designated Critical Drainage Area, with the existing culverts and channels at the limit of their capacity.
- Ayleston Brook has recently benefited from a flood defence scheme to tackle the fluvial and surface water flood risk issues within the area.
- The Modbury Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

Landscape

- The South Devon AONB overlaps with the southern section of the Neighbourhood Plan area, containing several special qualities which classify its distinctiveness and value.
- The Neighbourhood Plan area is within the 'Plymouth and Modbury Farmlands' character area and the 'River Valley Slopes and Combes' landscape character type, as defined within the Devon Landscape Character Assessment.
- South Hams District Council have allocated several Tree Preservation Orders in the parish in the interest of their amenity value.
- The significant local views across the parish are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process.

Historic Environment

- The Neighbourhood Plan area contains one Grade I, two Grade II* and 122 Grade II nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. It is currently not possible to determine whether the Grade II listed buildings are 'at risk'.
- There are three scheduled monuments within or within proximity to the Neighbourhood Plan area which are protected by the Ancient Monuments and Archaeological Areas Act 1979.
- Designated in July 1969 and covering most of the built settlement of the town, Modbury Conservation Area contains 98 listed buildings with architectural and historic qualities that contribute to its interest and distinctiveness.
- A management plan has not been prepared for Modbury Conservation Area, therefore it is currently not possible to determine whether the area might benefit from positive strategies to protect and enhance its distinctiveness and special qualities.
- Designated in August 1987, the 'Flete' Registered Historic Park and Garden partly overlaps with the western section of the Neighbourhood Plan area.
- Land towards the south western boundary of the Neighbourhood Plan area is within the boundary of the South Devon Heritage Coast.
- The HER for Devon and Dartmoor contains 378 records within Modbury Parish including a variety of structures and archaeological finds which positively contribute to the historic character of the Neighbourhood Plan area.

Land, Soil and Water Resources

- There are three patches of land which have been classified as 'Grade 3a' towards the north of the Neighbourhood Plan area. However, most of the undeveloped areas surrounding Modbury have a low likelihood (less than or equal to 20%) of containing BMV land.
- The Provisional Agricultural Land Quality dataset shows that the Neighbourhood Plan area is predominantly covered by Grade 3 agricultural land. However, without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is BMV.
- The main watercourse flowing through the Neighbourhood Plan area is the River Erme.
- There are three ordinary watercourses which flow through the Neighbourhood Plan area, namely: Ayleston Brook, Sheephams Brook and the Lower Erme.
- Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency's Catchment Data Explorer classifies Ayleston Brook and the Lower Erme as having a 'moderate' overall water quality status.
- The reasons for not achieving good status (RNAGs) for Aylseton Brook and the Lower Erme are primarily attributed to the following activities: farm / site infrastructure, riparian / in-river activities (including bankside erosion) and sewage discharge.

Population and Community

- The population of Modbury increased at a higher rate between 2001 and 2011 than South Hams, the South West of England and England averages.
- Generally, there is a higher proportion of residents within the 60+ age category within the Neighbourhood Plan area (31.7%) in comparison to the regional and national trends.
- Modbury has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the parish's sense of identity.
- There are 19 areas of land which the Neighbourhood Plan proposes to designate as local green spaces, including the Millennium Meadow, Little Meadow Hill and Dogapit Meadow.
- In terms of deprivation, the South Hams 008B LSOA is amongst the top 30% most deprived areas within the 'Living Environment' domain.

Health and Wellbeing

- 4.3% of residents in the Neighbourhood Plan area consider themselves to have 'bad health' or 'very bad health'.
- 81.5% of residents in the Neighbourhood Plan area confirm that their activities are 'not limited'. This is similar to the totals for South Hams (80.8%), the South West of England (81.6%) and England (82.4%).
- The main challenges which have been identified in the JSNA for Devon are linked to population, equality and diversity, economy, community and environment, deprivation, starting well, living well and ageing well.
- Published in June 2018, the JSNA district profile for the South Hams indicates that 30.2% of residents have a BMI over 30, with 21.5% of residents completing low levels of physical activity.

Transportation

- The Neighbourhood Plan area is not directly connected to the rail network, with no stations located within its boundaries.
- The A379 experiences congestion due to its narrow and steep nature, particularly at peak times of the day (i.e. rush hours and weekends). Congestion issues are heightened due to several turnings from side-roads onto the A379 and pedestrian crossings.
- 10.9% of residents in the Neighbourhood Plan area either catch a train, bus, minibus, coach or walk to work. This is lower than the percentage for South Hams (11.5%), the South West of England (13.2%) and England (15.0%).
- The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van.
- 87.7% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for South Hams (86.7%), the South West of England (81.1%) and England (74.2%).
- The total number of households in the Neighbourhood Plan area with access to at least two cars or vans is higher than the regional and national trends.
- Pedestrian safety at several locations throughout the Neighbourhood Plan area is a key concern from residents.

SEA Framework

3.5 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the submission version of the Modbury Neighbourhood Plan will be assessed consistently using the framework.

Table 3.2: SEA Framework for the Modbury Neighbourhood Plan

SEA Objective	Assessment questions
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geodiversity	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the European designated sites located within proximity to the Neighbourhood Plan area? • Support the status of the nationally and locally designated sites within and within proximity to the Neighbourhood Plan area? • Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?

SEA Objective	Assessment questions
Landscape	
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the natural beauty and special qualities of the South Devon AONB, in line with the Management Plans? • Conserve and enhance locally important landscape and townscape features within the Neighbourhood Plan area as defined by the character area, character type and TPOs? • Conserve and enhance local diversity and character? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?
Historic Environment	
Protect, conserve and enhance heritage assets within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Support the integrity of the historic setting of key buildings of cultural heritage interest as listed on the HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies?
Land, Soil and Water Resources	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land? • Protect the integrity of mineral safeguarding areas?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption? • Protect surface water resources?

SEA Objective	Assessment questions
Population and Community	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Support the provision of land for allotments and cemeteries?
Reduce deprivation and promote a more inclusive and self-contained community.	
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
Health and Wellbeing	
Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Address the key challenges identified in the JSNA for Devon? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use? • Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?
Transportation	
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

4. What has plan making / SEA involved up to this point?

Introduction

- 4.1 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Modbury Neighbourhood Plan. The SEA Regulations⁹ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.4 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development. Specifically, this chapter explains how the Modbury Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area.

Overview of plan making / SEA work undertaken since 2015

- 4.5 Modbury Neighbourhood Plan's development began early in 2015, initiated by Modbury Parish Council. It has been led by the Neighbourhood Plan Steering Group, which includes representatives of the Parish Council and volunteers from the local community.
- 4.6 Significant public consultation has been carried out to date to support the Neighbourhood Plan. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included events, a stall at the Modbury May Fair, household questionnaires and engagement through the Neighbourhood Plan website.
- 4.7 The Statement of Consultation which accompanies the Modbury Neighbourhood Plan for submission describes in more detail how the community has been involved during the development of the Neighbourhood Plan.

Assessment of reasonable alternatives for development strategies

Sites allocated in Modbury through the Plymouth and South West Devon Joint Local Plan

- 4.8 The Plymouth and South West Devon JLP, which was adopted in March 2019, allocates three sites in Modbury for housing and employment. These sites are as follows:
- West of Palm Cross: 92 homes; 1,900 sq.m. employment floorspace
 - Pennpark: 40 homes
 - West of Barracks Road: 40 homes

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

4.9 The location of these sites is presented in the map below.



Figure 4.1: Sites allocated in Modbury through the South West Devon JLP

Consideration of alternative sites following consultation on the Neighbourhood Plan

- 4.10 Consultation undertaken to date for the Modbury Neighbourhood Plan has highlighted that there is a desire amongst the community to consider alternative sites to those allocated in the JLP. This is in part due to a perception amongst residents that focusing housing provision on the three sites to the west of the town is not the most appropriate spatial strategy for delivering growth in Modbury in the period to 2034.
- 4.11 To date construction at two of the three sites allocated through the JLP has begun, and only development at the Pennpark site has not progressed to date. In light of this, only alternative options for the Pennpark allocation would be reasonable to assess for the Neighbourhood Plan.
- 4.12 Following discussions, South Hams District Council has advised the Neighbourhood Group that the JLP allocation of 40 homes at Pennpark is not a strategic proposal. As such, if seen fit, the Neighbourhood Plan can substitute the site for an alternative site, providing there is clear evidence and support for the change.

Neighbourhood Plan site assessment and initial shortlisting of sites

- 4.13 During the earlier stages of the Neighbourhood Plan’s development, there was a recognition that the Neighbourhood Plan would potentially need to allocate sites for new development. In light of this, the Neighbourhood Plan Steering Group undertook an assessment of the various available sites in the vicinity of the town.

4.14 This considered the 16 sites previously assessed through the South Hams and West Devon Strategic Housing Land Availability Assessment (SHLAA)¹⁰. These sites were assessed against a range of criteria relating to suitability, availability and achievability. Subsequent to this process, nine sites were shortlisted as being appropriate for further consideration as potential allocations for the Neighbourhood Plan.

4.15 These sites are as follows:

- Site A: Land to the North of Dartmouth Road (SHLAA site reference SH-35-04)
- Site B: Land to the South of Dartmouth Road (half of SHLAA site reference SH-35-05a)
- Site C: East of Aylestone Park (half of SHLAA site reference SH-35-05a)
- Site D: Scalders Lane (SHLAA site reference SH-35-01)
- Site E: Oodles, South of Poundwell Street and Car Park (RA2) (SHLAA site reference SH-35-09)
- Site F: Pennpark Farm (SHLAA site reference SH-35-14)
- Site G: Pennpark Farm (SHLAA site reference SH-35-13)
- Site H: West of Barracks Road (SHLAA site reference SH-35-03)
- Site I: Pennpark Farm (SHLAA site reference SH-35-12)

4.16 The location of these shortlisted sites is highlighted in the map below.

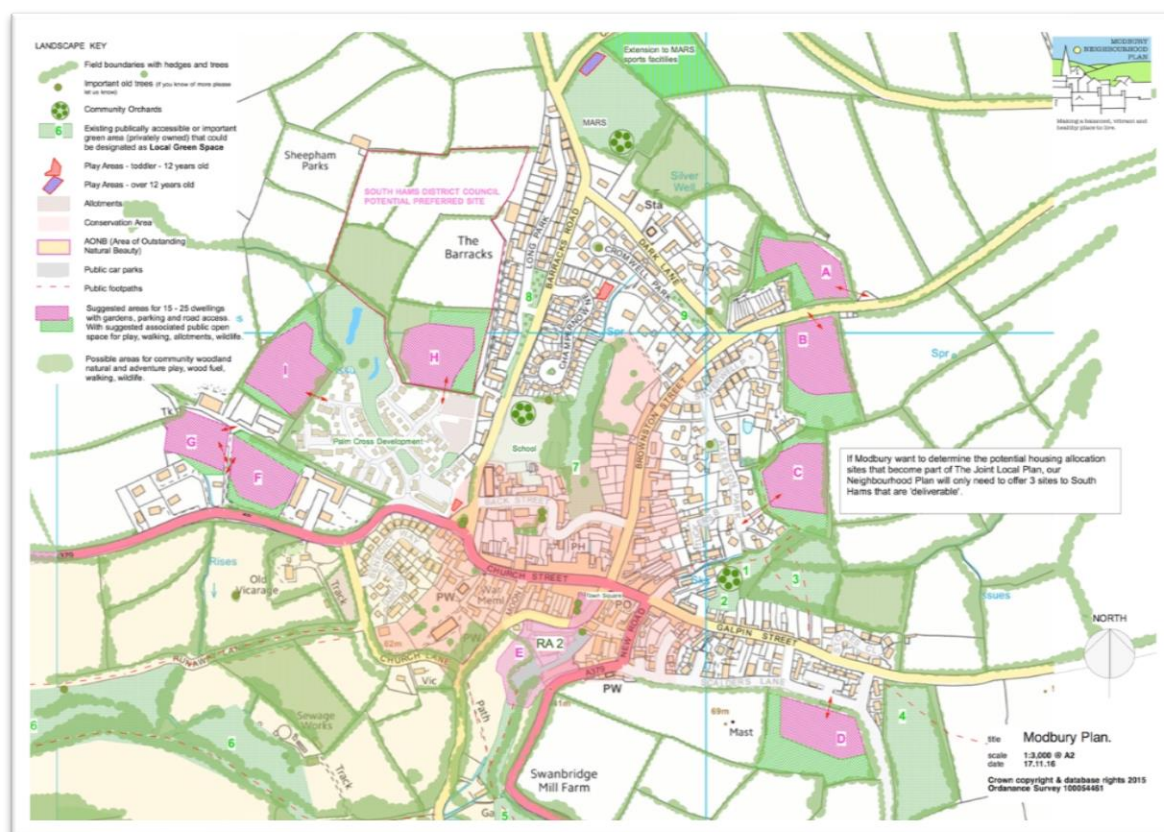


Figure 4.2: Location of sites initially shortlisted for the purposes of the Neighbourhood Plan¹¹

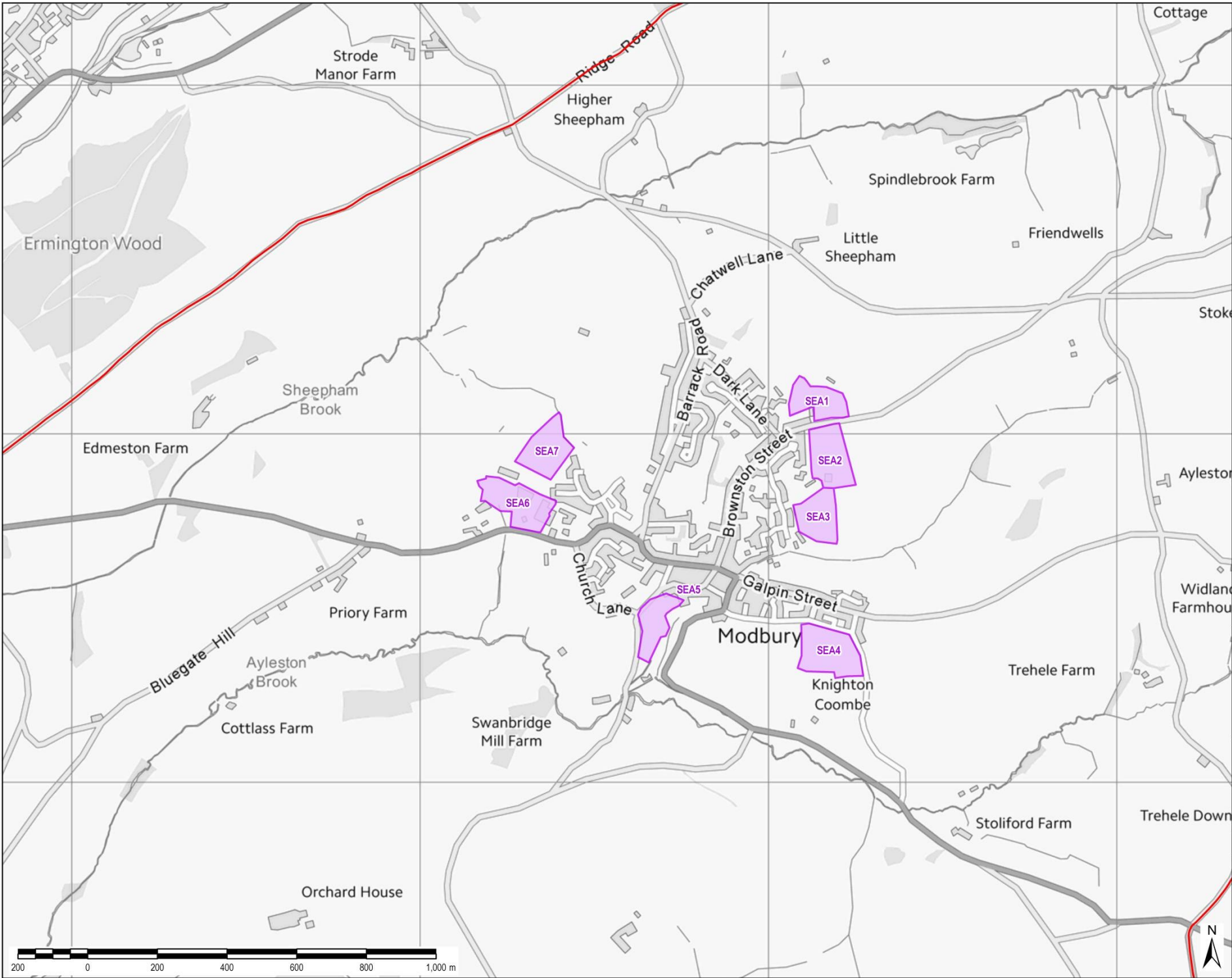
¹⁰ South Hams District Council & West Devon Borough Council (March 2017) Strategic Housing Land Availability Assessment

¹¹ Map is from an earlier consultation event undertaken for the Neighbourhood Plan

Assessment of the shortlisted sites through the SEA process

- 4.17 As discussed above, the Neighbourhood Plan Steering Group has sought to respond to consultation undertaken during earlier stages of the Neighbourhood Plan. This indicated a community desire for an alternative site to the JLP allocation at Pennpark to be considered for allocating through the Neighbourhood Plan.¹²
- 4.18 To support the consideration of the suitability of the shortlisted sites for a potential allocation of this type in the Neighbourhood Plan, the SEA process has undertaken a separate appraisal of the key environmental constraints present at each of the relevant sites. This has considered the potential effects that may arise as a result of a housing development of 40 homes at these locations (reflecting the size of the JLP allocation at Pennpark).
- 4.19 In this context the sites have been considered in relation to the SEA Framework of objectives and decision-making questions developed during SEA scoping (Chapter 3) and the baseline information. This SEA site assessment was undertaken separately to the site assessment undertaken by the Modbury Neighbourhood Plan Steering Group.
- 4.20 The sites assessed through the SEA process are the same as the shortlisted sites above, with the exception of the following:
- Site F and G have been combined to reflect the full extent of the site allocated through the JLP for 40 homes.
 - The JLP allocation at West of Barracks Road (Site H) has not been considered given the site is now under construction. As such, the site is no longer appropriate to consider as a potential allocation for the purposes of the Neighbourhood Plan.
- 4.21 The locations of the seven sites assessed through the SEA process are presented in Figure 4.3 below. The tables which follow present a summary of this assessment and provide an indication of each site's sustainability performance in relation to the eight SEA themes.

¹² The site allocated through the JLP at Pennpark incorporates sites F and G discussed above.



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LEGEND

- Modbury Neighbourhood Plan Area
- Site Allocation
- SEA1 - Land to the north of Dartmouth Road
- SEA2 - Land to the south of Dartmouth Road
- SEA3 - East of Ayleston Park
- SEA4 - Scalders Lane
- SEA5 - Oodles, South of Poundwell Street and Car Park (RA2)
- SEA6 - Penn Park Farm
- SEA7 - Penn Park Farm (2)

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Purpose of Issue
FINAL

Client
MODBURY NEIGHBOURHOOD PLAN STEERING GROUP

Project Title
STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE MODBURY NEIGHBOURHOOD PLAN

Drawing Title
SITES ASSESSED FOR THE PURPOSES OF THE SEA

Drawn CN	Checked JW	Approved RP	Date 21/11/2019
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SEA site assessment findings

Table 4.1: Site SEA1, Land to the north of Dartmouth Road

SEA theme	Commentary, SEA1, Land to the north of Dartmouth Road	
Biodiversity and Geodiversity	<p>The site does not contain significant biodiversity constraints.</p> <p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for “Residential development of 100 units or more” relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.</p>	
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivered as a replacement for the Local Plan allocation for 40 homes; as such no significant additional greenhouse emissions are anticipated as a result of development at this location.</p> <p>The site is in relative proximity to the services and facilities in the town centre (c.550m), helping to limit the need to travel to local amenities (and associated greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p>	
Landscape	<p>Whilst the site is not within the South Devon AONB, it is visible from the AONB, given it is located above the town. There are likely to be views into the site from properties at Trainee Villas.</p>	
Historic Environment	<p>The site is not within the setting of the Modbury Conservation Area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings.</p> <p>No features listed on the Historic Environment Record are located on or adjacent to the site.</p>	
Land, Soil and Water Resources	<p>As the site is a greenfield location, development would not make the best use of previously developed land.</p> <p>Recent agricultural land classification has been undertaken on the site. This highlights that the land is Grade 3b agricultural land, which is defined as ‘moderate’ quality agricultural land. This land is not classified as ‘the best and most versatile’ agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Modbury town centre (c.550m) which will limit the need for residents to travel for the amenities provided here. However, these can only be accessed via a steep hill, which may reduce accessibility for some.</p>	
Health and Wellbeing	<p>The site is accessible to Modbury Health Centre, which is located approximately 700m away at Poundwell Meadow. The site is accessible to the Public Rights of Way network via the key town footpath which begins to the south of the site on the far side of Dartmouth Road.</p>	

SEA theme	Commentary, SEA1, Land to the north of Dartmouth Road	
Transportation	<p>The site is located at relative proximity to services and facilities in Modbury town centre (c.550m). However, these can only be accessed via a steep hill.</p> <p>The site is also located approximately 550m to the nearest bus stop, with services to Plymouth and Kingsbridge. Other locations in Modbury are however more accessible to public transport services in the town.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.2: Site SEA2, Land to the south of Dartmouth Road

SEA theme	Commentary, SEA2, Land to the south of Dartmouth Road	
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for “Residential development of 100 units or more” relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.</p> <p>Whilst the site itself does not have significant biodiversity constraints, the site is bounded by mature field boundaries incorporating trees and hedgerows which form important components of local ecological networks.</p>	
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivered as a replacement for the Local Plan allocation of 40 homes; as such no significant additional greenhouse emissions are anticipated as a result of development at this location.</p> <p>The site is in relatively good proximity to the services and facilities in the town centre (c.500m), helping to limit the need to travel to local amenities (and associated greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p>	
Landscape	<p>Whilst the site is not within the South Devon AONB, it is visible from the AONB. Forming part of the field pattern when viewed from the AONB, the site is gently sloping. The mature trees on the site boundaries form an important component of local landscape character.</p> <p>Due to mature trees along all four hedgerow boundaries, the site has minimal visibility from properties within Modbury town, and also has minimal visibility from public footpaths within the AONB.</p>	

SEA theme	Commentary, SEA2, Land to the south of Dartmouth Road	
Historic Environment	<p>The site is not within the setting of the Modbury Conservation Area.</p> <p>No listed buildings are present on the site. However, a cluster of six nationally listed buildings are present within 50m of the south west of the site. These include: the Grade II* listed Old Traine and West Cottage; the Grade II listed Gate Cottage; the Grade II listed Gate House; the Grade II listed Pound House and Pound House Barn; the Grade listed Steps and archway immediately east of Old Traine; and the Grade II listed Gateway and steps c15m south of Old Traine and West Cottage. Whilst these features are screened to an extent by mature lime trees, the site remains within the setting of these nationally designated features.</p> <p>No other features listed on the Historic Environment Record are located on or adjacent to the site.</p>	
Land, Soil and Water Resources	<p>As the site is a greenfield location, development would not make the best use of previously developed land.</p> <p>Recent agricultural land classification has been undertaken on the site. This highlights that the land is Grade 3b agricultural land, which is defined as 'moderate' quality agricultural land. This land is not classified as 'the best and most versatile' agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located in relative proximity to services and facilities in Modbury town centre (c.500m) which will limit the need for residents to travel for the services and facilities provided here.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Modbury Health Centre at Poundwell Meadow, which is located approximately 650m away. The site is accessible to the Public Rights of Way network and the town's wider green infrastructure network via the footpath located on the western boundary of the site.</p>	
Transportation	<p>The site is located at relative proximity to services and facilities in Modbury town centre (c.500m). The site is also located approximately 500m to the nearest bus stop, with services to Plymouth and Kingsbridge. Other locations in Modbury are however more accessible to public transport services in the town.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.3: Site SEA3, East of Ayleston Park

SEA theme	Commentary, SEA3, East of Ayleston Park
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for “Residential development of 100 units or more” relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.</p> <p>Whilst the site itself does not have significant biodiversity constraints, the site is bounded by mature field boundaries incorporating trees and hedgerows which form important components of local ecological networks.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivered as a replacement for the Local Plan allocation of 40 homes; as such no significant additional greenhouse emissions are anticipated as a result of development at this location.</p> <p>The site is in good proximity to the services and facilities in the town centre (c.300m), helping to limit the need to travel by car to local amenities (and associated greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p>
Landscape	<p>Whilst the site is not located within the South Devon AONB, it is visible from the AONB, including public rights of way.</p> <p>The site forms an integral part of the linear valley field pattern of the landscape to the east of the town. The site is visible from properties on Galpin Street, Church street and Aylestone Park.</p>
Historic Environment	<p>The site is not within the setting of the Modbury Conservation Area.</p> <p>No listed buildings are present on the site. However, the Grade II listed Gate Cottage is located 50m to the north west of the site. Whilst this feature is screened to an extent by trees and the Old Traine Barn, the site remains within the setting of this nationally designated feature.</p> <p>No other features listed on the Historic Environment Record are located on or adjacent to the site.</p>
Land, Soil and Water Resources	<p>As the site is a greenfield location, development would not make the best use of previously developed land.</p> <p>Recent agricultural land classification has been undertaken on the site. This highlights that the vast majority of the land (with the exception of the southern edge) is Grade 3b agricultural land, which is defined as ‘moderate’ quality agricultural land. This land is not classified as ‘the best and most versatile’ agricultural land. The southern edge of the site is covered by land classified as Grade 4 agricultural land, which is defined as ‘poor’ quality agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located in good proximity to services and facilities in Modbury town centre (c.300m) which will limit the need for residents to travel for the amenities provided here.</p>

SEA theme	Commentary, SEA3, East of Ayleston Park	
Health and Wellbeing	The site is accessible to the doctors' surgery at Modbury Health Centre at Poundwell Meadow, which is located approximately 400m away. The site is accessible to the Public Rights of Way network via the footpath which runs through the site. It also has ready access to Tuckers Brook and the Millennium Meadow, which are key green infrastructure assets.	
Transportation	The site is located in good proximity to services and facilities in Modbury town centre (c.300m), and is linked via footpath along Tuckers Brook and the Millennium Meadow. The site is also located approximately 300m to the nearest bus stop, with services to Plymouth and Kingsbridge.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.4: Site SEA4 Scalders Lane

SEA theme	Commentary, SEA4, Scalders Lane	
Biodiversity and Geodiversity	<p>The site does not contain significant biodiversity constraints.</p> <p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for "Residential development of 100 units or more" relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.</p>	
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivered as a replacement to the Local Plan allocation for 40 homes; as such no significant additional greenhouse emissions are anticipated as a result of development at this location.</p> <p>The site is in good proximity to the services and facilities in the town centre (c.400m), helping to limit the need to travel to local amenities (and associated greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p>	
Landscape	<p>Whilst the site is not located within the South Devon AONB, it is highly visible from the AONB, the boundary of which is located 250m to the south. In this respect the site slopes to the south, forming part of the sloping topography down to the A379 and Mill Leat, which is located at the bottom of a valley. Development at this location, whilst it would form a continuation of the existing built up area of Modbury, would therefore impact on the setting of the AONB associated with the far side of the Mill Leat/A379, including from public rights of way.</p>	

SEA theme		Commentary, SEA4, Scalders Lane	
Historic Environment		<p>The site is not within the setting of the Modbury Conservation Area.</p> <p>No listed buildings are present on the site, and the site is not within the setting of a listed building.</p> <p>According to the Historic Environment Record, the site of a former well (marked on historic mapping) is located on the site. However, given this feature not visible on the surface, and would not cover a large extent, it is not a significant constraint.</p>	
Land, Soil and Water Resources		<p>As the site is a greenfield location, development would not make the best use of previously developed land.</p> <p>The majority of the site is classified as Grade 3b agricultural land, which is defined as 'moderate' quality agricultural land. This land is not classified as 'the best and most versatile' agricultural land. The remainder of the site, covering the north western 30% of the site, is covered by land classified as Grade 4 agricultural land, which is defined as 'poor' quality agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community		<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located in good proximity to services and facilities in Modbury town centre (c.400m) which will limit the need for residents to travel for the services and facilities provided here. However, these can only be accessed via a steep hill, which may reduce accessibility for some.</p>	
Health and Wellbeing		<p>The site is accessible to the doctors' surgery at Modbury Health Centre at Poundwell Meadow, which is located approximately 320m away. The site is accessible to the Public Rights of Way network via a footpath which runs behind Traine Terrace. The site is also located in close proximity to the proposed Local Green Space located to the east of Traine Terrace.</p>	
Transportation		<p>The site is located in good proximity to services and facilities in Modbury town centre (c.400m). The site is also located approximately 350m to the nearest bus stop, with services to Plymouth and Kingsbridge. Services and facilities and the bus stop are however only accessible via a steep hill, which will limit accessibility for those who are mobility impaired or those with small children. Access to the site by car is problematic given the width of Scalders Lane and the topography and presence of parked cars on Galpin Street.</p>	
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

Table 4.5: Site SEA5, Oodles, South of Poundwell Street and Car Park (RA2)

SEA theme	Commentary, SEA5, Oodles, South of Poundwell Street and Car Park (RA2)
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for “Residential development of 100 units or more” relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>A small area of Traditional Orchard BAP Priority Habitat is located approximately 65 meters south of the site. However, given access to the habitat is not likely to be enabled or enhanced through the delivery of housing provision at the site, no impacts are anticipated.</p> <p>No County Wildlife Sites or Local Nature Reserves are located in the vicinity of the site. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.</p> <p>The site itself does not contain significant biodiversity constraints, although the mature trees on the western boundary form part of local ecological networks.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivered as a replacement to the Local Plan allocation for 40 homes; as such no significant additional greenhouse emissions are anticipated as a result of development at this location.</p> <p>The site is in excellent proximity to the services and facilities in the town centre (less than 200m), helping to limit the need to travel to local amenities (and associated greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, significant parts of site are located within identified flood risk zones for fluvial and surface water flooding. In this respect, according to the Flood Map for Planning, parts of the site are within a ‘high’ risk of fluvial and surface water flooding (meaning that each year areas of the site have a chance of flooding of greater than 3.3%). This is a significant constraint for the site.</p>
Landscape	<p>The site is located within the South Devon AONB. Development at this location is however relatively screened from the wider landscape by topography, and existing development would help screen parts of the site. This provides scope for high quality design on the site to reflect the special qualities of the AONB.</p>
Historic Environment	<p>Whilst the site is not within the Modbury Conservation Area, it is located adjacent. As such, development at this location has the potential to impact on the setting of the conservation area. However, the site is screened from the conservation area to the west by a sunken lane (Church Lane) and a row of trees, and existing townscape quality is affected by the presence of the Health Centre and Poundwell Meadows to the north and by the car park to the east.</p> <p>The Grade II listed Poundwell House is located east of the car park, with views to and from the feature across the car park. Development in the north of the site therefore has the potential to lead to impacts on its setting.</p> <p>No other features listed on the Historic Environment Record are located on or adjacent to the site.</p>
Land, Soil and Water Resources	<p>The site is a mixture of previously developed and greenfield land.</p> <p>The undeveloped part of the site has been classified as a mixture of ‘poor’ quality Grade 4 agricultural land and ‘very poor’ quality Grade 5 agricultural land. As such development at this location will not lead to the significant loss of productive agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>

SEA theme	Commentary, SEA5, Oodles, South of Poundwell Street and Car Park (RA2)	
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing. The site is located in excellent proximity to services and facilities in Modbury town centre (less than 200m) which will limit the need for residents to travel for the services and facilities provided here.	
Health and Wellbeing	The site is very accessible to the doctors' surgery at Modbury Health Centre at Poundwell Meadow, which is located adjacent. The site is accessible to the Public Rights of Way network via a footpath which runs through the site.	
Transportation	The site is located in excellent proximity to services and facilities in Modbury town centre (less than 200m). The site is also located approximately 100m to the nearest bus stop, with services to Plymouth and Kingsbridge.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.6: Site SEA6, Penn Park Farm

SEA theme	Commentary: SEA6, Penn Park Farm	
Biodiversity and Geodiversity	The site does not contain significant biodiversity constraints. There are no European or nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for "Residential development of 100 units or more" relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed. There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.	
Climate Change	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivering the Local Plan allocation for 40 homes; as such no additional greenhouse emissions are anticipated as a result of development at this location. The site is relatively accessible to the services and facilities in the town centre (c.600m), which will help limit the need to travel by private car to local amenities. In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. A very limited surface water pathway is located in the centre of the site; this is not however a significant constraint.	
Landscape	Whilst the site is not within the South Devon AONB, it is visible from the AONB, which is located on the opposite (southern) side the A379, and there are some longer distance views from footpaths within the AONB. The site forms a prominent site at the entrance to Modbury from the west. The site, which is not subject to open views, should however be seen in the context of existing surrounding development. It has low landscape and visual value, as it is edged on three sides by 20 th century development. Development at this location, although within the setting of the AONB, is therefore unlikely to have significant adverse impacts on wider landscape character.	

SEA theme	Commentary: SEA6, Penn Park Farm	
Historic Environment	<p>The site is not within the setting of the Modbury Conservation Area.</p> <p>No nationally listed buildings are present on the site. The site is also not within the setting of any listed buildings.</p> <p>No features listed on the Historic Environment Record are located on the site. The site is adjacent to a probable deerpark, 'Sheepham Park', which is located to the north of the site and listed on the Historic Environment Record. However, much of the immediate area in the vicinity of the site covered by the former deerpark is developed.</p>	
Land, Soil and Water Resources	<p>The site is a mixture of a previously developed and greenfield land. Development of the site would lead to the loss of some agricultural land.</p> <p>Recent agricultural land classification has been undertaken on the site. This highlights that the land is Grade 3b agricultural land, which is defined as 'moderate' quality agricultural land. This land is not classified as 'the best and most versatile' agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Modbury town centre (c.600m). However, given topography, the location of the site at the top of a hill may limit accessibility to the town centre for those who are mobility impaired. The location of the site though remains accessible to the town centre for most by foot. There is however currently a lack of a footway for part of the route, including at Coppers Corner. This has the potential to cause accessibility issues for some road uses, including those with small children.</p>	
Health and Wellbeing	<p>The site is relatively accessible to the doctors' surgery at Modbury Health Centre, Poundwell Meadow, which is located approximately 700m away. The site is accessible to the Public Rights of Way network (located across the main road) and open space (including new open space in the west of the town).</p>	
Transportation	<p>The site is located at relative proximity to services and facilities in Modbury town centre (c.600m). However, given topography, the location of the site at the top of a hill may limit accessibility to the town centre for those who are mobility impaired. There is also currently a lack of a footway for part of the route, including at Coppers Corner. This has the potential to cause accessibility for some road users, including those with small children.</p> <p>The site is located approximately 300m to the nearest bus stop with services to Plymouth and Kingsbridge. The site does not however currently have safe pedestrian access to the bus stop.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.7: Site SEA7, Penn Park Farm (2)

SEA theme	Commentary: SEA7, Penn Park Farm (2)
Biodiversity and Geodiversity	<p>There are no European or nationally designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the site. The site is within a SSSI impact risk zone for “Residential development of 100 units or more” relating to the Erme Estuary SSSI. However, given development of the site would deliver only c.40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. Like all of the sites, it is within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone.</p> <p>Whilst the site itself does not have significant biodiversity constraints, the site is bounded to the east by mature field boundaries incorporating trees and hedgerows which form important components of local ecological networks.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is relatively accessible to the services and facilities in the town centre (c.650m), which will limit the need to travel by private car to local amenities.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding. A very limited surface water pathway is located on the northern boundary of the site; this is however not a significant constraint.</p>
Landscape	<p>The site is not within the South Devon AONB, and due to topography (which slopes down to the north), is not visible from the AONB.</p> <p>The site is however subject to open and wide views to the north, and is very visible from the north west due to its elevated position in the landscape. This has the potential to lead to significant impacts on landscape character from the north west of the town.</p>
Historic Environment	<p>The site is not within the setting of the Modbury Conservation Area.</p> <p>No nationally listed buildings are present on the site. The site is also not within the setting of any listed buildings.</p> <p>The site is on the site of a probable deerpark, 'Sheepham Park', which is listed on the Historic Environment Record and covers a large area to the north west of Modbury. However, much of the area in the vicinity of the site covered by the former deerpark is already developed.</p>
Land, Soil and Water Resources	<p>As the site is a greenfield location, development would not make the best use of previously developed land.</p> <p>The majority of the site is classified as Grade 3b agricultural land, which is defined as ‘moderate’ quality agricultural land. This land is not classified as ‘the best and most versatile’ agricultural land. The remainder of the site, covering the north eastern 25% of the site, is covered by land classified as Grade 4 agricultural land, which is defined as ‘poor’ quality agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The site is located at relative proximity to services and facilities in Modbury town centre (c.650m). However, given topography, the location of the site at the top of a hill may limit accessibility to the town centre for those who are mobility impaired or those with small children.</p>
Health and Wellbeing	<p>The site is relatively accessible to the doctors’ surgery at Modbury Health Centre, Poundwell Meadow, which is located approximately 700m away. The site is accessible to open space (including new open space in the west of the town).</p>

SEA theme	Commentary: SEA7, Penn Park Farm (2)	
Transportation	<p>The site is located at relative proximity to services and facilities in Modbury town centre (c.650m). However, given topography, the location of the site at the top of a hill may limit accessibility to the town centre for those who are mobility impaired or those with small children.</p> <p>The site is located approximately 350m to the nearest bus stop, with services to Plymouth and Kingsbridge.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.8: Summary of SEA site assessment findings

Site	Biodiversity and Geodiversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population and Community	Health and Wellbeing	Transport
SEA1								
SEA2								
SEA3								
SEA4								
SEA5								
SEA6								
SEA7								
Key								
Likely adverse effect (without mitigation measures)						Likely positive effect		
Neutral/no effect						Uncertain effects		

Assessment of alternatives for the use of housing in the Neighbourhood Plan area

- 4.22 Following the undertaking of a number of consultation events with the local community, a further element in which the Neighbourhood Group was keen to explore further was the issue of permanent and second homes and holiday letting.
- 4.23 To consider this issue in more detail, and provide further sustainability context, the SEA process appraised two options, as follows:
- Option A: Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in Modbury through introducing restrictions on the use of new housing; and
 - Option B: Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.
- 4.24 These two broad options were appraised as ‘reasonable alternatives’ against both the baseline and relatively (i.e. against each other). They were considered through the SEA Framework of objectives and assessment questions developed during scoping and ranked in terms of their sustainability performance against the relevant theme. The findings of the appraisal are presented in Table 4.9.

Table 4.9: Appraisal findings: reasonable alternatives linked to housing use

Option A: Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in Modbury through introducing restrictions on the use of new housing; and

Option B: Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt A	Opt B
Biodiversity and geodiversity	<p>Option B has the potential to lead to increased effects on biodiversity assets during peak holiday periods. This includes through increasing activities which affect designated sites in the plan area, including the River Erme SSSI. However, these effects are unlikely to be significant given the current management of the site and the likely limited contribution to pressures on the site from additional visitor numbers.</p> <p>All sites have the potential to have significant impacts on biodiversity assets if located inappropriately and have poor design and layout. Likewise all sites have the potential to promote net gains in biodiversity value. In this context, for both options, potential effects on biodiversity depend on aspects such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features. It is unlikely that the tenure of housing will affect the extent to which this is achieved.</p>	N/A	N/A

Option A: Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in Modbury through introducing restrictions on the use of new housing; and

Option B: Do not introduce restrictions on the use of new housing in the Neighbourhood Plan area.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt A	Opt B
Climate change	<p>In terms of adaptation to the effects of climate change, an increase in the Neighbourhood Plan area's year round (rather than seasonal) population through Option A has the potential to increase resilience to extreme weather events. This includes through increasing the year round availability of 'human capital', which will help improve the maintenance of existing properties (and neighbourhoods) and enabling a more effective response to extreme weather events when they occur.</p> <p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the Neighbourhood Plan area. Whilst greenhouse gas emissions are likely to increase during peak holiday periods under Option B, Option A has the potential to increase the carbon footprint of the Neighbourhood Plan area during the rest of the year. Overall it is uncertain at this level of detail which of the options is likely to do most to limit greenhouse gas emissions over an annual period.</p>	1	2
Landscape and historic environment	A policy which seeks to restrain second home and holiday home ownership in the Neighbourhood Plan area is unlikely to have any significant implications for landscape quality or the integrity of the historic environment. Potential effects depend largely on the location, design and layout of new development areas.	N/A	N/A
Land, soil and water resources	In terms of soil quality and availability, the tenure of new housing in the plan area is unlikely to have significant effects.	N/A	N/A
Population and community	<p>A policy restricting the use of new homes as second homes or holiday lets through Option A will provide increased opportunities for local people to secure a place on the housing ladder or afford larger homes.</p> <p>Option A, through increasing the year-round population also has increased potential to support the viability of services and amenities, including health and education provision. It will also support the viability of public transport provision. This will promote accessibility to services, facilities and amenities amongst local people.</p>	1	2
Health and wellbeing	Option A, through facilitating a larger increase in the year-round population of the Neighbourhood Plan area, has the potential to support the viability of health services and leisure and recreational facilities.	1	2
Transport	<p>Congestion levels in the Neighbourhood Plan area are significantly affected by visitor traffic. In this context Option B is likely to contribute to congestion issues during peak times of the year, including the summer period. Due to relatively small proportion of the total housing stock that will be affected by the options, effects are however likely to be limited.</p> <p>Whilst Option A has the potential to increase year-round traffic flows, it also has the potential to support the viability of year-round public transport networks. This will support accessibility for those living in the Neighbourhood Plan area.</p>	1	2

Preferred approach in the Neighbourhood Plan in light of appraisal findings

Choice of site allocation taken forward through the Neighbourhood Plan

4.25 The submission version of the Neighbourhood Plan allocates 40 homes on the East of Ayleston Park site (site SEA3 considered above). This is in place of the site allocated at Pennpark through the South West Devon JLP (site SEA6).

4.26 The stated reasons for this are as follows:¹³

- Land in the east of the town is generally well contained in a valley which looks in towards the town rather than outwards to the surrounding countryside (as is broadly the case to the west).
- Allocation of the site has the capacity to link more directly to the town centre via both roads and footpaths, making for a more walkable and sustainable community.
- Allocation of the site is more likely to result in journeys on foot around the town, helping to sustain social contact and healthy lifestyles.
- Earlier planning permissions in Modbury had included conditions requiring that existing hedgebanks and trees in the landscape to the east of Ayleston Park be allowed to grow and mature, establishing a landscape context which can more effectively and successfully accommodate and integrate new development into its setting.
- The site would better related to the scale and character of the town and to the town centre in particular.
- The site will deliver an increased number of affordable homes than have been achieved on other developments in Modbury. The JLP includes a target of 30% affordable homes on new housing sites of 11 dwellings or more. This is the target for Pennpark, which would mean that of the 40 homes proposed on the site only up to 12 might be affordable. Negotiations on the East of Ayleston Park site have resulted in a figure of 50%, which would lead to the delivery of 20 affordable homes.

Primary residence condition

4.27 The submission version of the Neighbourhood Plan also places a condition on open market housing that the houses should be occupied as a primary residence. This is given the proportion of second or holiday homes has recently seen significant increases in surrounding parishes (reflecting increased demand for such properties), and the perception that this trend, if extended to Modbury, has the potential to have a significant impact on the ability of local residents, their relatives and those with other local connections to rent or buy in the town. This proposed approach has also been supported through consultation events undertaken for the Neighbourhood Plan to date.

¹³ Modbury Neighbourhood Plan Steering Group (August 2019) Modbury Neighbourhood Plan, The Case for the Site East of Ayleston Park

Neighbourhood Plan policies

4.28 To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.6, the submission version of the Modbury Neighbourhood Plan puts forward 14 policies to guide development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering.

4.29 The policies presented in the submission version of the Neighbourhood Plan are as follows:

Table 4.10: Modbury Neighbourhood Plan policies

Policies

MNP1	Location, Scale and Character of Development
MNP2	Design and Construction
MNP3	Development Site Proposals
MNP4	Heritage and Conservation
MNP5	Housing Development
MNP6	Principal Residence Requirement
MNP7	Safe Movement and Transport
MNP8	Business Development
MNP9	Town Centre Shopping
MNP10	Broadband and Communications Infrastructure
MNP11	Community Facilities and Infrastructure
MNP12	Protecting the Landscape
MNP13	Supporting Biodiversity
MNP14	Local Green Spaces and Public Open Space

4.30 The next chapter presents the findings of the assessment of these policies.

5. What are the appraisal findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the Modbury Neighbourhood Plan. This chapter presents:
- An appraisal of the current version of the Neighbourhood Plan under the eight SEA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Approach to this appraisal

- 5.2 The appraisal is structured under the eight themes taken forward for the purposes of the SEA.
- 5.3 For each theme, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity and Geodiversity

- 5.5 The Neighbourhood Plan area as a whole is relatively constrained in biodiversity terms. The 'Start Point to Plymouth Sound and Eddystone' Special Area of Conservation (SAC) is located approximately 3km to the south of the parish. Likewise, the parish falls within the zone of influence of the Tamar Estuaries Complex Special Protection Area and the Plymouth Sound and Estuaries SAC. At the national level, there are two Sites of Special Scientific Interest (SSSI) located within or within proximity to the Neighbourhood Plan area. This includes the Erme Estuary SSSI, which is also designated as a Marine Conservation Zone. Additionally, the Neighbourhood Plan area contains a variety of County Wildlife Sites (CWS) and Biodiversity Action Plan (BAP) Priority Habitats and Species, some of which are listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). Whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to future development in the Neighbourhood Plan area to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest and 2) support the resilience of ecological networks.
- 5.6 There are no European designated biodiversity or geodiversity sites within, adjacent or close to the boundary of the proposed site allocation at 'East of Ayselston Park' (Policy MNP3). However, the site does fall within a South Hams SAC Greater Horseshoe Bat Landscape Connectivity Zone. In this respect, Objective A within Policy MNP13 'Supporting Biodiversity' affirms that development shall not harm but maintain and enhance biodiversity, paying due regard to internationally important sites including existing, candidate or proposed SPAs and SACs. Additionally, Objective L and M within Policy MNP2 'Design and Construction' acknowledge that new developments should not cause unnecessary light pollution, providing

safeguards both during and after construction to protect against environmental damage. This will protect nocturnal species in the parish. Furthermore, Policy MNP14 'Local Green Spaces and Public Open Space' seeks to safeguard such areas from development. New areas of open space and community woodland will be encouraged and required in association with new development, with a longer term aspiration of this policy to deliver a 'necklace of community woodland' around Modbury. This will strengthen ecological networks and indirectly benefit European designated sites by maintaining the availability of alternative locally accessible green spaces for recreation. Given the Neighbourhood Plan will be in conformity with the quantum of development in the Local Plan, no additional effects are anticipated in relation to the integrity of the European designated sites within and within proximity to the Neighbourhood Plan area.

- 5.7 There are no nationally designated biodiversity or geodiversity sites within or adjacent or close to the boundary of the proposed site allocation at 'East of Ayleston Park'. The site is within a SSSI impact risk zone for "Residential development of 100 units or more" relating to the Erme Estuary SSSI. However, given the proposed site allocation at 'East of Ayleston Park' would deliver only 40 homes, no significant effects on the SSSI are anticipated as a result of the scale of development proposed. Moreover, the provisions of Objective B in Policy MNP13 seeks to ensure that development shall safeguard nationally important sites from development.
- 5.8 Published in July 2018, paragraph 170 (d) within the revised NPPF¹⁴ states that planning policies and decisions should contribute to and enhance the natural and local environment by '*minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks*', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan¹⁵ which was published in January 2018.
- 5.9 In this regard, ecological networks within the Neighbourhood Plan area are supported through Objective C and D in Policy MNP13, affirming that locally important sites, wildlife corridors and ecological features that connect habitats and biodiversity shall not be harmed through development. The proposed site allocation is bound by mature field boundaries incorporating trees and hedgerows which form important components of local ecological networks. Policy MNP1 'Location, Scale and Character of Development' states that within the settlement boundary, the scale, density and character of development shall be in keeping with the site and surroundings, causing no adverse impacts to (amongst other considerations): natural assets. Objective C within Policy MNP2 'Design and Construction' also highlights that all new development shall retain and where possible incorporate significant field patterns, hedgerows, important trees and woodlands. The provision of these policies will ensure that ecological sensitivities are appropriately considered during the planning, construction and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

Climate Change

- 5.10 The Neighbourhood Plan acknowledges that South Hams District Council resolved to declare a 'climate and biodiversity emergency'¹⁶ in July 2019. In the context of the Modbury Neighbourhood Plan, parishioners view the declaration as a significant 'call for action' to tackle the consequences and causes of the climate crisis and seek to embed environmentally sustainable practices in response to the challenges faced. As such, several policies in the Neighbourhood Plan emphasise the importance of mitigating and adapting to the climate crisis.
- 5.11 In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. Based on the 2011 Census data, the most regularly used method of travelling to work in the parish is via driving, with 87.7% of

¹⁴ MHCLG (2018): 'Revised National Planning Policy Framework', [online] available to access via:

<<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>> last accessed [05/11/19]

¹⁵ DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via:

<<https://www.gov.uk/government/publications/25-year-environment-plan>> last accessed [05/11/19]

¹⁶ South Hams District Council (2019): 'Climate Change and Biodiversity Emergency', [online] available to access via:

<<https://www.southhams.gov.uk/article/5525/South-Hams-Declares-Climate-Change-and-Biodiversity-Emergency->> last accessed [22/11/19]

- households in the Neighbourhood Plan area having access to at least one car or van. In this respect, Policy MN7 'Safe Movement and Transport' affirms that development shall include good, safe pedestrian access and links with enhanced opportunities for walking, cycling, shared mobility and the use of public transport. This will positively contribute to climate change mitigation efforts through encouraging alternative options of transportation. Likewise, the proposed site allocation at 'East of Ayleston Park' (see Policy MNP3) is in good proximity to the services and facilities in the town centre (c.300m), helping to limit the need to travel to local amenities (and associated greenhouse gas emissions).
- 5.12 It is important to acknowledge that development at 'East of Ayleston Park' will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the town and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development. The site would also be delivered as a replacement for the Joint Local Plan allocation of 40 homes; as such no significant additional greenhouse emissions are anticipated as a result of development at this location.
- 5.13 Likewise, Objective F within Policy MNP2 'Design and Construction' confirms that all new development shall provide three phase electricity supply to enable the incorporation of low carbon technologies to maximise sustainability and energy efficiency and meet the challenges of climate change. Objective H within the policy also states that all new developments should reduce reliance on fossil fuels, utilise sustainable building materials, maximise solar gain and encourage private or community owned energy options. Furthermore, Policy MNP3 'Development Site Proposals' states that the development of 40 dwellings on Land East of Ayleston Park' should include sustainable construction and energy efficiency. These policies will further contribute to climate change mitigation efforts within the Neighbourhood Plan area.
- 5.14 With reference to adapting to the effects of climate change, the proposed site allocation at 'East of Ayleston Park' is not located within identified flood risk zones for fluvial or surface water flooding. Located down the hill, Ayleston Brook has also recently benefited from a flood defence scheme to tackle the fluvial and surface water flood risk issues within the area. Nonetheless, Objective L within Policy MNP2 indicates that all new development shall safeguard against the risks of flooding and ensure satisfactory surface water drainage, including sustainable urban drainage schemes. This is particularly important as there have been several historical surface water flooding events within Modbury. These have been generally caused by a combination of factors such as direct runoff following heavy rainfall and inadequate or blocked drainage systems. The provisions of the NPPF will further help to ensure that developments are located way from the areas at highest risk of flooding.
- 5.15 Policy MNP11 'Community Facilities and Infrastructure' contains several objectives for sustaining community life in Modbury, including the provision of community woodland for biofuel. This will positively encourage a shift from the reliance on fossil fuels and support the principle of carbon neutrality, pro-actively engaging with and responding to the climate crisis. Additionally, the protection of open spaces and habitats within the Neighbourhood Plan area through the provisions of Policy MNP14 'Local Green Spaces and Public Open Space' will safeguard natural carbon sequestrators located within the landscape (i.e. trees and hedgerows). This will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and reducing surface water run-off.

Landscape

- 5.16 The southern section of the Neighbourhood Plan area overlaps with the South Devon Area of Outstanding Natural Beauty (AONB). This part of the Neighbourhood Plan area contains several of the AONB's 'special qualities' which contribute to its value. In terms of landscape character, the Neighbourhood Plan area is within the 'Plymouth and Modbury Farmlands' character area and the 'River Valley Slopes and Combes' character type, as defined within the Devon Landscape Character Assessment, containing distinctive features which positively contribute to the local landscape. Additionally, South Hams District Council have allocated several Tree Preservation Orders in the parish in the interest of their amenity value. These sensitivities are acknowledged by the policies within the Neighbourhood Plan, which have a strong focus on protecting the sense of place and special qualities which contribute to the

character of Modbury, respecting the setting of the AONB and safeguarding the integrity of local landscape features.

- 5.17 Concerning the proposed allocation at 'East of Ayleston Park' identified through Policy MNP3 'Development Site Proposals', the site is not within or adjacent to the South Downs AONB, but is within its setting. Reflecting this, the policy highlights that the development should include a high quality design in appearance, alongside landscaping. Likewise, the integrity of the AONB will be protected through Policy MNP12 'Protecting the Landscape'. Specifically, Objective A of this policy confirms that development shall not harm but conserve and enhance the landscape by complying with national and local strategic policies for the AONB, including the South Devon AONB Management Plan. Furthermore, in relation to the addition of new infrastructure in the Neighbourhood Plan area, Policy MNP10 'Broadband and Communications Infrastructure' confirms that proposals to expand electronic communications and broadband will only be supported providing (amongst other considerations) the apparatus is sited to minimise impacts on the AONB.
- 5.18 The proposed allocation at 'East of Ayleston Park' forms an integral part of the linear valley field pattern of the landscape to the east of the town. As such, Objective C and Objective D within Policy MNP12 'Protecting the Landscape' affirms that development should incorporate high quality landscape design which safeguards and enhances existing features, reinforces local landscape character, restores degraded landscapes and retains significant groups of trees. Similarly, Policy MNP8 'Business Development' outlines support for new business, commercial and employment development providing that (amongst other considerations) it is in keeping with the locality. Furthermore, Objective C within Policy MNP1 'Location, Scale and Character of Development' states that all new development shall retain and where possible enhance local landscape character and tranquillity and integrate into the landscape. The provisions of these policies will positively consider the sensitivities of the locality, protecting its character and surroundings from inappropriate types of development.
- 5.19 The protection of significant local views across the parish are an important consideration in the planning process, as the scale, height and mass of a development can ultimately impact on important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded over time. In this respect, although the proposed site allocation is not located within the South Devon AONB, it is visible from public rights of way in the AONB. Similarly, the site is also visible from properties on Galpin Street, Church street and Ayleston Park. Policy MNP1 'Location, Scale and Character of Development' states that within the settlement boundary, the scale, density and character of development shall be in keeping with the site and surroundings, causing no adverse impacts to (amongst other considerations): important views or skylines. This is reaffirmed through Policy MNP2 'Design and Construction', particularly Objective A, and Policy MNP12 'Protecting the Landscape', particularly Objective B. Therefore, these policies take a proactive and positive approach to protecting and enhancing the character and visual amenity of the Neighbourhood Plan area.

Historic Environment

- 5.20 The Neighbourhood Plan area has a rich historic environment, recognised through the diversity of features and areas within or within proximity to Modbury that are nationally and locally valued for their cultural heritage interest. This includes one Grade I, two Grade II* and 122 Grade II listed buildings, three scheduled monuments, Modbury Conservation Area, Flete Registered Historic Park and Garden, the South Devon Heritage Coast, and 378 records of structures and archaeological finds on the Historic Environment Record for Devon and Dartmoor. This is reflected by Neighbourhood Plan policies which have a strong focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings.
- 5.21 For example, Policy MNP1 'Location, Scale and Character of Development' states that within the settlement boundary, the scale, density and character of development shall be in keeping with the site and surroundings, causing no adverse impacts to (amongst other considerations): heritage assets. Likewise, Objective B within Policy MNP2 'Design and Construction' notes that

all new developments shall respect and where possible enhance local heritage, character and vernacular, safeguarding local distinctiveness and paying due regard to the Modbury Village Design Statement. Objective D of the policy also indicates that all new developments shall include boundary features using local natural stone and traditional Devon hedgebanks.

- 5.22 With reference to the site allocation at 'East of Ayleston Park', Policy MNP3 'Development Site Proposals' affirms that the development should include a high quality design in appearance. Whilst there are no listed buildings present on the site, the Grade II listed Gate Cottage is located 50m to the north west of the site. Whilst this feature is screened to an extent by trees and the Old Traine Barn, the site remains within the setting of this nationally designated feature. As such, Objective A within Policy MNP4 'Heritage and Conservation' states that designated historic and heritage assets and their settings, both above and below ground, shall be conserved and enhanced.
- 5.23 Otherwise, the site allocation at 'East of Ayleston Park' is not within the setting of the Modbury Conservation Area, and no other features listed on the Historic Environment Record are located on or adjacent to the site. Nonetheless, Objective B of Policy MNP4 affirms that development proposals are required to not harm but enhance non-designated heritage assets and their settings. Alongside, Objective C of the policy states that development proposals shall pay full regard to the provisions and guidelines contained in the Modbury Conservation Area Appraisal, particularly for guidance on suitable details and materials. This provides an appropriate basis for the conservation and enhancement of the historic environment in the conservation area. The provisions of this policy will therefore provide opportunities for new development to positively contribute to the fabric and setting of heritage assets through high-quality design which reflects the historic character and special qualities of the parish.
- 5.24 In terms of local historic character, Policy MNP8 'Business Development' outlines support for new business, commercial and employment development providing that (amongst other considerations) it is in keeping with the locality. The provisions of this policy will indirectly and positively contribute to the protection of heritage assets and their setting. This is reinforced through Policy MNP9 'Town Centre Shopping' which confirms that the change of use of shops will only be permitted if it would not undermine the retail character. This supports the integrity of Modbury as a historic market town for trade and commerce.

Land, Soil and Water Resources

- 5.25 The proposed site allocation at East of Ayleston Park will take place on undeveloped greenfield land. Whilst this will not support the efficient use of land, recent agricultural land classification undertaken on the site highlights that the vast majority of the land (with the exception of the southern edge) is Grade 3b agricultural land, which is defined as 'moderate' quality agricultural land. The southern edge of the site is covered by land classified as Grade 4 agricultural land, which is defined as 'poor' quality agricultural land. As such, land on the site is not classified as 'the best and most versatile' agricultural land. Also, in terms of water quality, the site allocation is not located within a Groundwater Source Protection Zone.
- 5.26 A number of the policies seek to protect key features of landscape and biodiversity interest, aim to protect designated sites, areas of landscape sensitivity and promote green space and open space (see Section 5.5 to 5.19). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including through the promotion of high quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

Population and Community

- 5.27 The Modbury Neighbourhood Plan sets out a range of provisions which will support the quality of life of the parish's residents.
- 5.28 The Neighbourhood Plan allocates one site for 40 dwellings at the site East of Ayleston Park (Policy MNP3, Development Site Proposals). This is a replacement for the JLP allocation at

Pennpark. Given this is anticipated to meet objectively assessed housing need, it is assumed that this growth quantum will help meet housing needs arising locally.

- 5.29 The Neighbourhood Plan also has a close focus on delivering affordable housing. The allocation at the site East of Ayleston Park seeks to deliver 20 affordable homes, which comprises 50% of the allocation on the site. This compares favourably with the likely delivery of 12 affordable homes, or 30% of the total on the JLP allocation at Pennpark. Elsewhere, as set out in Policy MNP5 (Housing Development), each new housing development which exceeds 10 units will be required to provide at least 30% affordable homes, and proposals for small scale 100% affordable housing schemes on rural exception sites will be supported through the Neighbourhood Plan.
- 5.30 Policy MNP5 (Housing Development) will further support the delivery of housing appropriate for local people through explicitly seeking to deliver homes of a type to reflect local needs. In this respect the policy highlights that new development should include at least 75% of 1, 2 and 3 bedrooms to reflect local need for single people, couples and families. The policy also supports the delivery of new homes for older people. This will respond to a need to improve the balance of the housing stock locally, and to meet the needs of an ageing population. The policy also supports a Community Land Trust or self-build solution to delivering new housing; this has been shown to be in many locations an effective mechanism for delivering high quality and affordable homes for local people.
- 5.31 The Neighbourhood Plan seeks to support the delivery of high quality design within housing. This includes through Policy MNP2 (Design and Construction), which seeks to: enable low carbon technologies to be integrated in design to maximise sustainability and energy efficiency; meet and where possible exceed government standards for sustainable construction and water efficiency; and maximise solar gain and encourage private or community owned energy options. This will be further reinforced by Policy MNP3 (Development Site Proposals) which specifically supports sustainable construction and energy efficiency at the proposed development site at East of Ayleston Park. These provisions will therefore facilitate the delivery of high quality and energy efficient housing, promoting the quality of life of residents in the Neighbourhood Plan area, supporting social inclusion and helping to address issues such as fuel poverty.
- 5.32 Community consultation on the Neighbourhood Plan has highlighted a significant concern that an increasing number of holiday homes and second homes have the potential to affect the vitality of the Neighbourhood Plan area. In this context surrounding parishes and communities have seen a rapid recent increase in the proportion of second homes, which it is viewed has the potential to be mirrored in Modbury. In recognition of this, the Neighbourhood Plan through Policy MNP6 (Principal Residence Requirement) seeks to ensure that new housing, excluding replacement dwellings or those managed by a Registered Social Landlord, will only be supported where there is a restriction to ensure its occupancy as a principal residence which is guaranteed through a planning condition or legal agreement. Whilst it is recognised that these provisions may potentially be difficult to implement, the policy has the potential to support the availability and affordability of new housing, and improve accessibility to the housing stock for local people.
- 5.33 Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In relation to the proposed housing allocation taken forward through the Neighbourhood Plan, the site East of Ayleston Park is located in good proximity to services and facilities in Modbury town centre (c.300m), and is linked via a footpath along Tuckers Brook and the Millennium Meadow. It is also accessible to key public transport links from the town centre, including bus services to Kingsbridge and Plymouth. Accessibility will be further supported by the Neighbourhood Plan's focus on supporting the vitality of the town centre and new community provision. This includes through Policy MNP11 (Community Facilities and Infrastructure), which has a close focus on facilitating the delivery of additional community infrastructure. In this respect this policy identifies the key community infrastructure to be supported in the Neighbourhood Plan area during the plan period, including:
- facilities for the young and for the elderly, including for children's play;

- public space and sports provision;
 - footpaths and cycle provision;
 - creating a civic space in the area behind The White Hart;
 - community woodland for recreation, habitat and biofuel;
 - community allotments for food security and public community orchards; and
 - new play areas distributed around the town.
- 5.34 The vitality of the town centre will be further supported through Policy MNP9 (Town Centre Shopping), which seeks to protect retail provision in the town centre through precluding change of use where appropriate.
- 5.35 The Neighbourhood Plan also seeks to promote the economic vitality of the Neighbourhood Plan area and support employment opportunities. Policy MNP8 (Business Development) supports new business, commercial and employment development subject to a set of criteria being met. The policy also seeks to ensure the retention of economic uses at Plymouth Road, Barrack Road and Poundwell Street, which are key employment areas in the Neighbourhood Plan area. Recognising the importance of small businesses and homeworking in the area, the policy also supports home-based businesses and the delivery of a work hub. Employment and economic opportunities will also be supported by Policy MNP10 (Broadband and Communications Infrastructure), which seeks to expand electronic communications and broadband infrastructure. This will support running a business from home and home working.
- 5.36 Overall therefore, the Neighbourhood Plan has the potential to have significant positive effects in relation to the Population and Communities SEA theme through delivering housing which meets local needs, by promoting social inclusion, and through supporting community vitality.

Health and Wellbeing

- 5.37 In terms of the proposed Neighbourhood Plan site allocation, the site East of Ayleston Park is accessible to Modbury Health Centre at Poundwell Meadow, which is located approximately 400m away. The site is also accessible to the town's Public Rights of Way network via the footpath which runs through the site and also has ready access to Tuckers Brook and the Millennium Meadow, which are key green infrastructure assets.
- 5.38 More broadly, the Neighbourhood Plan policies will bring a range of further benefits for health and wellbeing. The main impacts of the Neighbourhood Plan's policies on health and wellbeing will be through protecting and enhancing the Neighbourhood Plan area's high quality environment and public realm and green infrastructure provision. Green infrastructure provides space – including natural green space – for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation¹⁷. This will support physical and mental health and wellbeing. A key policy in this regard is Policy MNP14 (Local Green Spaces and Public Open Space), which designates 18 Local Green Spaces in Modbury. In addition the policy encourages the delivery of new areas of public open space, play space, allotments, community woodlands and community orchards within new development areas.
- 5.39 Accessible green infrastructure provision in Modbury will be further supported by Policy MNP11 (Community Facilities and Infrastructure), which seeks to deliver: safe pedestrian access from the town to the Recreation Ground; facilities for children's play; public space and sports provision; footpath and cycle provision; community woodland for recreation; community allotments; and public community orchards.
- 5.40 Policy MNP7 (Safe Movement and Transport) sets out a range of provisions for enhancing pedestrian and cycle provision in the town and reducing the impact of the private car. Promoting the use of active modes of travel and healthier lifestyles, these elements are discussed further under the 'Transportation' SEA theme below. The policy will also support road safety in Modbury through seeking to reduce road speeds and delivering a study on road

¹⁷ Public Health England (2017)

safety in the town. The safety of vulnerable road users will also be supported by Policy MNP11 (Community Facilities and Infrastructure) which seeks to provide safe pedestrian access from the town to the Recreation Ground, deliver new footpaths and cycle provision and improve road safety around Modbury's school.

- 5.41 As discussed under the Population and Communities SEA theme, the Neighbourhood Plan seeks to support the delivery of high quality and energy efficient housing of a range of types and tenures. The policies also seek to ensure that new development is safe, attractive, inclusive and accessible, limits crime and the fear of crime, and does not cause unnecessary noise and light pollution. In this respect the Neighbourhood Plan will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.

Transportation

- 5.42 With regard to the proposed Neighbourhood Plan allocation at the site East of Ayleston Park, the site is located in good proximity to the services and facilities in Modbury town centre, which is approximately 300m away. The site is also linked via a footpath along Tuckers Brook and the Millennium Meadow. This will help limit the need to travel to key amenities in the town, and promote the use of alternative modes of transport to the car. This will be further supported by the site's relative access to public transport services; the site is located approximately 300m to the nearest bus stop, with services to Plymouth and Kingsbridge. The policy for the site, Policy MNP3 (Development Site Proposals), also seeks to maximise accessibility for future residents through aiming to ensure safe and convenient access for all is delivered at the site, and that good pedestrian access to the town centre is facilitated.
- 5.43 The Neighbourhood Plan policies otherwise have a close focus on promoting the use of sustainable modes of transport. In this respect Policy MNP7 (Safe Movement and Transport) seeks to ensure that development incorporates high quality, safe pedestrian access and links with enhanced opportunities for walking, cycling, shared mobility and public transport use. The policy also seeks to deliver improved pedestrian links around the school and enhance links to recreational and green spaces in the town, including Palm Cross and the recreation ground. In addition the policy seeks to limit the impacts of development on traffic congestion or highway safety. These provisions will be supported by Policy MNP11 (Community Facilities and Infrastructure), which seeks to provide a safe pedestrian access from the town to the Recreation Ground, improve road safety around the school, deliver new footpaths and cycle provision, and initiate shared space design for new developments.

Conclusions at this current stage

- 5.44 The assessment has concluded that the current version of the Modbury Neighbourhood Plan is likely to lead to significant long term positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on providing new housing to meet local needs in an accessible location, the provision of new community facilities and infrastructure in the town, support for community vitality, the protection and enhancement of green infrastructure networks in the area and the protection and enhancement of the quality of the public realm and neighbourhood distinctiveness.
- 5.45 The allocation at East of Ayleston Park proposed through the Neighbourhood Plan has the potential to have impacts on the setting (but not the fabric) of features nationally designated for the historic environment. In addition, the proposed allocation, whilst not within the South Devon AONB, can be viewed from, and as such is in the setting of, the AONB. The policies of the Neighbourhood Plan however proactively respond to these constraints, including through having a close focus on protecting and enhancing landscape and townscape character, and on conserving and enhancing the setting and fabric of the historic environment. Taken together, the policies will help limit negative effects from new development resulting on the allocation on landscape/townscape character and on the setting of the historic environment, and promote longer term positive effects through securing enhancements to local distinctiveness. Overall

therefore, no significant effects have been identified in relation to the 'Landscape' and 'Historic Environment' themes.

- 5.46 The Neighbourhood Plan facilitates the delivery of 40 homes on one greenfield site. This has the potential to lead to the loss of productive agricultural land in the Neighbourhood Plan area. However, given the greenfield development will not lead to the loss of areas of the Best and Most Versatile Agricultural Land in Modbury, impacts in relation to the 'Land, Soil and Water Resources' SEA theme are not likely to be significant.
- 5.47 In relation to the 'Climate Change' theme, no flood risk issues exist on the allocated site. In addition, the policies of the Neighbourhood Plan have a focus on addressing fluvial and surface water flood risk issues which provide an additional level of protection in relation to flood risk over and above the provisions of national and local policies. As such, it is considered that the Neighbourhood Plan will have overall positive effects in relation to climate change adaptation.
- 5.48 In terms of the 'Biodiversity and Geodiversity' and 'Transportation' themes, the Neighbourhood Plan will initiate a number of beneficial approaches. These are not though considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

6. What are the next steps?

- 6.1 This Environmental Report accompanies the Modbury Neighbourhood Plan for submission to the Local Planning Authority, South Hams District Council, for subsequent Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Plymouth and South West Devon Joint Local Plan.
- 6.3 If Independent Examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by South Hams District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Modbury Neighbourhood Plan will become part of the development plan for Modbury Parish.

Appendix A Context Review and Baseline

A1 – Air Quality

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- ‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’
- ‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.’
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’¹⁸ sets out several goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25 year plan directly relate to the air quality SEA theme.

In terms of the local context, South Hams District Council is required to monitor air quality across the county under Section 82 of the Environment Act (1995), report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area. Adopted in 2013, the AQAP for South Hams¹⁹ outlines a variety of measures for improving air quality in the three designated AQMAs within the district. In April 2018, South Hams District Council and West Devon Borough Council commenced a consultation on its emerging ‘Clean Air Strategy for South Hams and West Devon’²⁰ which includes a revised AQAP for each of the AQMAs. This will continue to be progressed to adoption.

At the local level, Policy DEV2: ‘Air, Water, Soil Noise, Land and Light’ within the Plymouth and South West Devon JLP directly relates to the air quality SEA theme.

Summary of Current Baseline

As of June 2018, there are three AQMAs in the district of South Hams, all of which are designated for exceedances in the annual mean concentration objective of 40µg/m³ for nitrogen dioxide (NO₂):

¹⁸ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 20/02/19]

¹⁹ South Hams District Council (2013): ‘Air Quality Action Plan’, [online] available to download via: <<https://www.southhams.gov.uk/article/3902/Air-Quality>> last accessed [15/02/18]

²⁰ South Hams District Council, West Devon Borough Council (2018): ‘A Clean Air Strategy for South Hams and West Devon: Incorporating the Air Quality Action Plans’, [online] available to access via: <<https://www.southhams.gov.uk/article/3902/Air-Quality>> last accessed [23/09/19]

- Dean Prior AQMA (declared in 2005): close to the A38 Devon Expressway;
- Ivybridge AQMA (declared in 2009): at locations along Western Road (the B3213); and
- Totnes AQMA (declared in 2009): at locations close to the A385.

As stated in the 2018 Air Quality Annual Status Report (ASR)²¹, all three AQMAs continue to report exceedances in the annual mean objective concentration of NO₂. However, none of the designated AQMAs in the district of South Hams are located within the Neighbourhood Plan area, with the air quality for most of the district generally considered to be very good.

South Hams District Council is not currently monitoring air quality within the Neighbourhood Plan area. The 2018 ASR confirms that non-automatic monitoring of NO₂ was completed at 16 sites during 2016, all of which were within or immediately surrounding the three AQMAs.

Summary of Future Baseline

Whilst no significant air quality issues currently exist within the Neighbourhood Plan area, the provision of new housing and/or employment land within the Neighbourhood Plan area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂, particularly along the main routes through the Neighbourhood Plan area (i.e. the A379).

Implementation of the aims and objectives contained within the Air Quality Action Plan, along with the policies in the Local Transport Plan (discussed in Chapter 10), present opportunities to continue to improve air quality within both the Neighbourhood Plan area and the wider district.

Additionally, South Hams and West Devon are currently in the process of preparing a 'Clean Air Strategy' for the area covered by these two local authorities. Once completed, the strategy will further contribute to improving air quality at both the local and regional level.

A2 – Biodiversity and Geodiversity

Context Review

At the European level, the EU Biodiversity Strategy²² was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'
- 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'
- 'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'
- 'To protect and enhance biodiversity and geodiversity, plans should:
 - a) *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally*

²¹ South Hams and West Devon Councils (2018) 2018 Air Quality Annual Status Report (ASR) [online] available at: <<https://www.southhams.gov.uk/article/3902/Air-Quality>> [accessed 16/09/19]

²² European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [27/06/18]

designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- b) *Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’.*

The Natural Environment White Paper (NEWP)²³ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK’s failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’ aims to ‘halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people’²⁴.

The recently published 25 Year Environment Plan²⁵ sets out the Government’s environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 ‘Thriving plants and wildlife’ and the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Chapter 5 ‘Securing clean, productive and biologically diverse seas and oceans’ directly relate to the Biodiversity and Geodiversity SEA theme.

At the local level, Policy DEV26 ‘Protecting and Enhancing Biodiversity and Geological Conservation’ and Policy DEV28 ‘Trees, Woodlands and Hedgerows’ within the Plymouth and South West Devon JLP directly relate to the biodiversity and geodiversity SEA theme.

²³ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [19/09/18]

²⁴ DEFRA (2011): ‘Biodiversity 2020: A strategy for England’s wildlife and ecosystem services’, [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [19/09/18]

²⁵ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 19/09/18]

In 1998 The Nature of Devon-Biodiversity Action Plan was published, identifying 29 key wildlife habitats and 251 key species as a priority for conservation action. Action Plans were produced for the 17 habitats and 20 species identified as requiring a county wide approach to their conservation. Devon's Biodiversity Action Plan was updated to include Geodiversity in 2009. The Devon Biodiversity and Geodiversity Action Plan²⁶ is presented in eight volumes:

- Introduction to the revised edition;
- Section A: Summary;
- Section B: A vision for variety;
- Section C: Planning for biodiversity and geodiversity conservation in Devon;
- Section D: A review of Devon's wildlife and geological heritage;
- Section E: Setting out priorities;
- Section F: Turning plans into action; and
- Appendix i: 'Priority Species' & 'Species of Conservation Concern' in Devon.

Summary of Current Baseline

European designated sites

There are no European designated sites located within the Neighbourhood Plan area. The nearest European designated site, the 'Start Point to Plymouth South and Eddystone' Special Area of Conservation (SAC) with Marine Components, is located approximately 3km to the south of the parish (at its nearest point). The SAC comprises coastal reef features associated with the extension of the exposed terrestrial geology out into the sublittoral zone and large areas of outcropping bedrock, boulders and cobbles in the offshore extents of the area. As such, the reefs are the Annex I habitat that are the primary reason for the designation of the SAC with Marine Components²⁷.

The Neighbourhood Plan area also falls within the Zone of Influence of the Tamar Estuaries Complex SPA and the Plymouth Sound and Estuaries SAC.

Nationally designated sites

Sites of Special Scientific Interest

There are two Sites of Special Scientific Interest (SSSIs) within and within proximity to the Neighbourhood Plan area, namely: Erme Estuary SSSI and Andrew's Wood SSSI, both of which have been notified under Section 28 of the Wildlife and Countryside Act 1981 (as amended).

Designated in February 1986 and covering an area of approximately 438.8 ha, the Erme Estuary SSSI partly overlaps with the south western section of the Neighbourhood Plan area and contains twelve notifiable features which are the primary reasons for its designation. The citation for the SSSI states²⁸:

"This small secluded estuary, located on the South Devon coast, contains fine examples of estuarine, saltmarsh, freshwater and oak-hazel woodland habitats. It supports an important breeding bird community and, additionally, provides feeding and roosting grounds for waterfowl on passage and in winter.

"The mouth of the River is characterised by extensive sandflats locally colonised by seaweeds such as flatwrack (*Fucus spiralis*) and (*Enteromorpha sp.*), with an often steep and rugged shoreline. Upstream, mudflats predominate, which support areas of saltmarsh dominated by common cord-grass (*Spartina anglica*), with seapurslane (*Halimione portulacoides*), sea aster (*Aster tripolium*) and glasswort (*Salicornia spp.*)

²⁶Devon County Council (2009) Biodiversity and Geodiversity Action Plan [online] available at <<https://new.devon.gov.uk/environment/wildlife>> last accessed [24/04/17]

²⁷ JNCC (ca 2017): 'Start Point to Plymouth Sound and Eddystone SAC', [online] available to access via: <<http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUcode=UK0030373>> last accessed [19/09/19]

²⁸ Natural England (no date): 'Erme Estuary SSSI', [online] available to access via: <<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1004385>> last accessed [19/09/19]

“At the head of the estuary, the saltmarsh grades into a succession of wet meadows lying beside the River Erme. These are subject to varying degrees of flooding and salinity and support areas of soft rush (*Juncus effuses*) and common reed (*Phragmites australis*). A number of artificial fish ponds and other freshwater pools occur. These have become partially silted up and carry fringing belts of reedswamp and support a wide variety of freshwater flora and fauna.

“The site as a whole supports a diverse breeding bird community which includes heron (*Ardea cinerea*), kingfisher (*Alcedo atthis*) and cirl bunting (*Emberiza cirius*). It also provides feeding and roosting grounds for wildfowl and waders on passage and during winter. The estuary and the River Erme is a spawning run for sea trout (*Salmo trutta*), and is frequented by European otter (*Lutra lutra*).”

Based on the most recently completed condition assessments undertaken between 2009 and 2017, 92.3% of the SSSI is classified as being in a ‘favourable’ condition, with the remaining 7.7% of the SSSI classified as ‘unfavourable – recovering’.

Designated in March 1985 and covering an area of approximately 23.3 ha, Andrew’s Wood SSSI is located approximately 250m to the south east of the Neighbourhood Plan area (at its nearest point) and contains two notifiable features which are the primary reasons for its designation. Part of the site is managed as a nature reserve by Devon Wildlife Trust. The citation for the SSSI states²⁹:

“Andrew’s Wood, a mosaic of species-rich grassland, wet heath and secondary woodland, supports the largest known colony in Britain of a nationally rare plant the Heath lobelia (*Lobelia urens*). Many of the old fields retain areas of species-rich grassland and have swards characterised by the abundance of Yorkshire fog (*Holcus lanatus*), sweet vernal-grass (*Anthoxanthum odoratum*) and purple moor-grass (*Molinia caerulea*), and also by the occurrence of such herbs as black knapweed (*Centaurea nigra*), saw-wort (*Serratula tinctoria*), marsh thistle (*Cirsium palustre*), cuckoo flower (*Cardamine pratensis*), lousewort (*Pedicularis sylvatica*) and betony (*Betonica officinalis*).

“Elsewhere, Andrew’s Wood comprises somewhat ill-drained, secondary woodland traversed by numerous hedge-banks and small water courses. The woodland is largely dominated by pedunculate oak (*Quercus robur*) but contains abundant silver birch (*Betula pendula*) together with some ash (*Fraxinus excelsior*), holly (*Ilex aquifolium*) and locally beech (*Fagus sylvatica*). The shrub layer is dominated by hazel (*Corylus avellane*) and there is vigorous development of honeysuckle (*Lonicera periclymenum*) and ivy (*Hedera helix*).

“The mosaic of grassland, heath and woodland supports a rich fauna. The breeding bird community is representative of woods in south-west England, and there are also breeding populations of dormouse (*Muscardinus avellanarius*), common lizard (*Lacerta vivipara*) and adder (*Vipera berus*). The invertebrate fauna is rich and includes such typical butterflies as marbled white (*Melanargia galathea*), silver-washed fritillary (*Argynnis cydippe*) and small pearl-bordered fritillary (*A. selene*).”

Based on the most recently completed condition assessment undertaken in 2013, 100.0% of the SSSI is classified as being in a ‘favourable’ condition.

SSSI Impact Risk Zones

Sites of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

In this context, most of the Neighbourhood Plan area overlaps with SSSI IRZ thresholds for the types of development which are likely to come forward, specifically: residential, rural residential, and rural non-residential development types. However, it is useful to acknowledge that the scale of proposals might not exceed the limits which are stipulated within these IRZ thresholds.

Marine Conservation Zones

²⁹ Natural England (no date): ‘Andrew’s Wood SSSI’, [online] available to access via: <<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1001297>> last accessed [19/09/19]

Marine Conservation Zones (MCZs) are areas that protect a range of nationally important, rare or threatened habitats and species within the 'blue belt' around the English Coast³⁰. Since 2013, the UK Government has designated over fifty MCZs, six of which are located off the Devonshire coast. Designated in May 2019 and partly overlapping with the SSSI, the Erme Estuary MCZ covers an area of approximately 1 km² and contains a wide variety of habitats from rocky shores to intertidal mud flats. These support many important species including several that are rare, such as the nationally scarce tentacled lagoon worm (*Alkmaria romijni*). The fact sheet for the MCZ also states³¹:

“Areas of intertidal rock within the estuary form the feature ‘Estuarine rocky habitats’. These areas of rock provide a hard surface for algae and animals to attach in an area dominated by sand and mud with variable salinity. At low tide these areas become foraging grounds for birds and crustaceans and at high tide they create shelter for juvenile species of fish.

“At the mouth of the river, exposed rocks are pounded by waves and currents washing away sand and mud leaving only bedrock or boulders. Mussels, limpets and barnacles can be found clinging to the rocks with patches of brown and red seaweeds growing in the crevices and on the landward side of the rocks.”

Locally important sites

County Wildlife Sites

County Wildlife Sites (CWS) are the most significant areas of semi-natural habitat in Devon outside of statutory European and nationally protected sites. They are designated through a strict criteria and data regarding the sites is collected by the Biodiversity Monitoring Framework³². CWS range from small copses and linear features like river valleys, to ancient woodlands, large moors and wetlands. There are several CWS located within and within proximity to the Neighbourhood Plan area.



CWS within and within proximity to Modbury (taken from DCC’s Environmental Viewer)³³

³⁰ GOV.UK (2016): ‘Marine Conservation Zones’, [online] available to access via: <https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england> last accessed [19/09/19]

³¹ DEFRA (2019): ‘Erme Estuary MCZ: Factsheet’, [online] available to access via: <https://www.gov.uk/government/publications/marine-conservation-zones-erme-estuary> last accessed [19/09/19]

³² Devon Biodiversity Records Centre (no date) County Wildlife Sites [online] <http://www.dbr.org.uk/county-wildlife-site-survey/> last accessed [11/02/18]

³³ Devon County Council (2019): ‘Environmental Viewer: CWS Layer’, [online] available to access via: <http://map.devon.gov.uk/DCCViewer/> last accessed [19/09/19]

BAP Priority Habitats

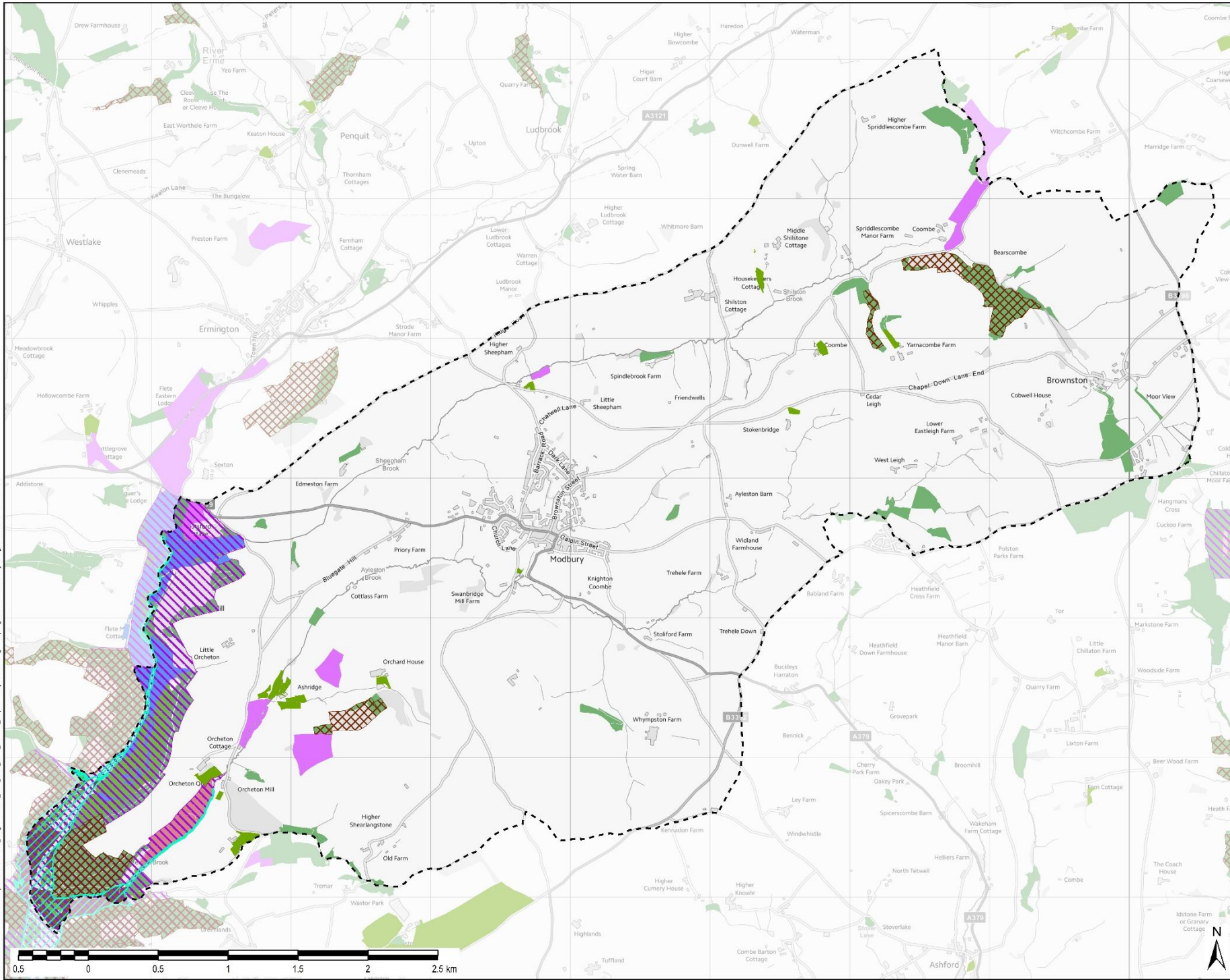
There are a variety of BAP priority habitats located within and within proximity to the Neighbourhood Plan area, including areas of ancient and semi-natural woodland, deciduous woodland, coastal and floodplain grazing marsh, coastal saltmarsh, good quality semi-improved grassland, lowland dry acid grassland, lowland fens, lowland meadows, mudflats, and traditional orchards. Most of the BAP priority habitats are associated with the Erme Estuary SSSI and MCZ.

Figure 3.1 (overleaf) shows the designated wildlife sites and BAP priority habitats located within and adjacent to the Neighbourhood Plan area.

Summary of Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised both within the Neighbourhood Plan area and in the surrounding areas.



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LEGEND

- Modbury Neighbourhood
- Plan Area
- Ancient Woodland
- Erme Estuary Marine Conservation Zone
- Site of Special Scientific Interest (SSSI)
- Biodiversity Action Plan Priority Habitats**
 - Coastal and Floodplain Grazing Marsh
 - Coastal Saltmarsh
 - Deciduous Woodland
 - Good Quality Semi-improved Grassland
 - Lowland Dry Acid Grassland
 - Lowland Fens
 - Lowland Meadows
 - Mudflats
 - Traditional Orchard

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Purpose of issue: **FINAL**

Client: **MODBURY NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title: **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE MODBURY NEIGHBOURHOOD PLAN**

Drawing Title: **BIODIVERSITY DESIGNATIONS AND HABITATS**

Drawn CN	Checked JW	Approved RP	Date 18/09/2019
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FIGURE 3.1

A3 – Climate Change

Context Review

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below³⁴ :

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act³⁵ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Climate Change Act includes the following:

- 2050 Target. The Act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels.
- Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same. For more detail, visit the UK adaptation policy page 36.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'

³⁴ GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>> last accessed [20/09/18]

³⁵ GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via <<http://www.legislation.gov.uk/ukpga/2008/27/contents>> last accessed [19/09/18]

³⁶ Committee on Climate Change (2017): 'UK Adaptation Policy' [online] accessible via <<https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/uk-adaptation-policy/>> last accessed [19/09/18]

- 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'
- 'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'
- Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'

The Flood and Water Management Act³⁷ highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).³⁸

Along with policies contained in Chapter 1 'Using and managing land sustainably' and Chapter 6 'Protecting and improving the global environment', Goal 4 'A reduced risk of harm from environmental hazards such as flooding and drought' and Goal 7 'Mitigating and adapting to climate change' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Climate Change SEA theme.

The Devon Local Flood Risk Management Strategy (2014-2020) aims to encourage more effective risk management by advising flood risk practitioners and the public on how flood risk will be managed and how duties under the Flood and Water Management Act (2010) will be fulfilled. Further guidance is provided in the document 'Planning for SuDS'.³⁹ This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

Released in 2007, the most recent Strategic Flood Risk Assessment (SFRA) for the South Hams District aims to provide an assessment of the impact of all potential sources of flooding within the district in order to provide recommendations of suitable mitigation measures.

At the local level, Policy DEV32 'Delivering Low Carbon Development', Policy DEV33 'Renewable and Low Carbon Energy (including heat)' and Policy DEV35 'Managing Flood Risk and Water Quality Impacts' within the Plymouth and South West Devon JLP directly relate to the climate change SEA theme.

³⁷ Flood and Water Management Act (2010) [online] available at: <<http://www.legislation.gov.uk/ukpga/2010/29/contents>> last accessed [19/09/18]

³⁸ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

³⁹ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via <http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx> last accessed [19/09/18]

Summary of Current Baseline

Contribution to climate change

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that South Hams has higher per capita emissions compared to the South West of England and England as a whole since 2005. South Hams has also seen a 36.9% reduction in the percentage of total emissions per capita between 2005 and 2016, similar to the reductions for the South West of England (36.7%) and England (37.6%)⁴⁰.

Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18) team⁴¹. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for South West England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows⁴²:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +10 to +20% in winter and -20% to -30% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;
- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;

⁴⁰ Department of Energy and Climate Change (2018) 2005 to 2016 UK local and regional CO2 emissions – data tables [online] available at: <<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>> [accessed 04/09/19]

⁴¹ The data was released on 26th November 2018: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [04/09/19]

⁴² Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <<https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps>> last accessed [04/09/19]

- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Flood risk

Most of the Neighbourhood Plan area is located within Flood Zone 1, showing that there is a <0.1% chance (1 in 1000) of river flooding in any given year. There are areas of land adjacent to the River Erme (in the western section of the Neighbourhood Plan area), Sheephams Brook (northern section of the Neighbourhood Plan area) and Ayleston Brook (central section of the Neighbourhood Plan area) which are located within Flood Risk Zone 3 and have a >1% chance of being flooded each year⁴³.

Completed in 2007, the Strategic Flood Risk Assessment (SFRA)⁴⁴ for South Hams states that notable surface water events have occurred in Modbury and are predominantly caused by intense, heavy rainfall causing water to runoff from surrounding areas.

Completed in 2016, an addendum to the SFRA⁴⁵ outlines that there have been nine historical flood risk events in the district of South Hams between 1970 and 2009, none of which impacted settlements within the Neighbourhood Plan area. However, the addendum states that properties within Modbury have been impacted by flood events since 2010 (following the introduction of the Flood and Water Management Act (2010) which requires Lead Local Flood Authorities (LLFAs) must carry out investigations into flooding and publish the findings):

- Flooding occurred in locations throughout Devon on 7th and 8th July 2012 following intense rainfall. A total of 237 properties were recorded as flooded throughout Devon, including 27 properties in Modbury.
- Between 20th and 25th November 2012 flooding occurred across Devon following heavy rainfall. A total of 466 properties were reported as flooded, including six within Modbury.
- In December 2012, widespread areas of Devon were affected by a long duration fluvial flood event which began on 22nd December 2012 and resulted in the flooding of 327 properties, including seven within Modbury.

Surface water flooding is a risk for some parts of the Neighbourhood Plan area, with sections of medium-high risk predominantly located around Sheephams Brook and Ayleston Brook⁴⁶. Specifically, the SFRA addendum also outlines the following statistics for Modbury relating to surface water flooding issues:

- There have been several historical surface water flooding events within Modbury. These have been generally caused by a combination of factors such as direct runoff following heavy rainfall and inadequate or blocked drainage systems
- Modbury is within a designated Critical Drainage Area⁴⁷, with the existing culverts and channels at the limit of their capacity.

⁴³ GOV UK (2019): 'Flood Map for Planning', [online] available at: <<https://flood-map-for-planning.service.gov.uk/>> last accessed [17/09/19]

⁴⁴ South Hams District Council (2007) 'Strategic Flood Risk Assessment Level 1 Report and Recommendations', [online] available to view via: <https://www.plymouth.gov.uk/sites/default/files/StrategicFloodRiskAssessmentLevel1ReportRecommendations.pdf> last accessed [17/09/19]

⁴⁵ Plymouth City Council (2016): Plymouth and South West Devon Joint Local Plan: Submitted Evidence Base – South Hams District Council SFRA Level 1 Addendum', [online] available to download via: <<https://www.plymouth.gov.uk/jointlocalplanevidencebase/>> last accessed [19/02/18]

⁴⁶ GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access from: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> last accessed [17/09/19]

⁴⁷ Devon County Council (2019): 'Flood Risk Management: Critical Drainage Areas', [online] available to access via: <<https://www.devon.gov.uk/floodriskmanagement/planning-and-development/>> last accessed [23/09/19]

- Some areas of high risk (1 in 30-year extent) affect properties and roads in the town centre at Back Street, Church Street and New Road. Areas of medium (1 in 100-year extent) to low risk (1 in 1,000-year extent) of surface water flooding to properties and roads include Brownston Street and Champernowne/Cromwell Park.

Notably, Ayleston Brook has recently benefited from a flood defence scheme to tackle the fluvial and surface water flood risk issues within the Neighbourhood Plan area.

Summary of Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars and busses. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

A4 – Landscape

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- ‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’
- Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’
- Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’
- ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - i. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
 - ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
 - iii. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

Adopted in April 2019 and covering the period until March 2024, the purpose of the South Devon AONB Management Plan⁴⁸ (2019-2024) is to:

- Highlight the special qualities and significance of the AONB;
- Present a vision for the future of the AONB;
- Set out objectives and policies to secure the vision;
- Identify what needs to be done, by whom and when;

⁴⁸ South Devon AONB Partnership (2019): ‘Management Plan 2019-2024’, [online] available to access via: <http://www.southdevonaonb.org.uk/about-the-aonb/looking-after-the-aonb/aonb-management-plan> last accessed [19/09/19]

- State the condition of the AONB and how the effectiveness of its management will be monitored;
- Reflect the views and aspirations of a wide range of AONB stakeholders and parties with an interest in it; and
- Co-ordinate the work of different partner organisations.

The Management Plan also highlights the following vision for the AONB, which is of an inspirational landscape that is valued, recognised and treasured forever for its nationally important natural beauty and distinctive character:

“The South Devon AONB is one of Britain’s finest protected landscapes – loved for its significant and irreplaceable landscape features including rugged cliffs, sandy coves, peaceful countryside, picturesque villages, rolling hills, wooded valleys, colourful hedge banks, and secretive estuaries. It is an ancient countryside with strong links to the sea and generations of human activity etched into the landscape. The AONB is a centre for active and creative community life, a thriving and dynamic work place and popular visitor destination.”

Additionally, the South Devon Estuaries Management Plan (2016-2024) aims to take a co-ordinated management approach which aims to secure the sustainable use, enjoyment and understanding of the five estuaries within the South Devon AONB: the Yealm, Erme, Avon, Salcombe-Kingsbridge and the Dart. The Plan outlines a variety of objectives and actions in order to achieve the following vision⁴⁹:

“The South Devon AONB Estuaries will be valued, recognised, treasured and conserved for their important natural beauty and rich historic heritage, their distinctive local character as part of the AONB, their individual uniqueness and their environmental importance to the wider natural and human community”.

At the local level, Policy DEV23 ‘Landscape Character’ and Policy DEV25 ‘Nationally Protected Landscapes’ within the Plymouth and South West Devon JLP directly relate to the landscape SEA theme.

Summary of Current Baseline

National Character Areas

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character.

The Neighbourhood Plan area is located within NCA Profile: 151 South Devon⁵⁰. The South Devon NCA is described as a plateau, dissected by steep valleys and rivers. Most of the area consists of mixed farming, with fields bounded by Devon hedge banks and narrow winding lanes. The south of the area contains internationally important coastal and estuarine habitats.

South Devon AONB

Designated in August 1960, the South Devon Area of Outstanding Natural Beauty (AONB) covers approximately 34,000 ha of coastline, estuaries and countryside, and overlaps with the south western section of the Neighbourhood Plan area (south of the A379). The AONB also incorporates the South Devon Heritage Coast, which covers the 75km of coastline between Wembury Beach (near to the Yealm Estuary) and Sharkham Point (near to Brixham). The following list of special qualities define the unique ‘natural beauty’ for which the South Devon AONB is designated as a nationally important protected landscape:

- Fine, undeveloped, wild and rugged coastline;

⁴⁹ South Devon AONB (2016): ‘Estuaries Management Plan 2016-2024’, [online] available to download via: <http://www.southdevonaonb.org.uk/about-the-aonb/looking-after-the-aonb/aonb-management-plan/estuaries-management-plan-public-consultation/> last accessed [15/02/18]

⁵⁰ Natural England (2014) ‘National Character Area – South Devon’ [online] Available at: <http://publications.naturalengland.org.uk/publication/1911063?category=587130> last accessed [06/09/17].

- Ria estuaries (drowned river valleys), steep combes and a network of associated watercourses;
- Deeply rural rolling patchwork agricultural landscape;
- Deeply incised landscape that is intimate, hidden and secretive away from the plateau tops;
- Iconic wide, unspoilt and expansive panoramic views;
- A landscape with a rich time depth and a wealth of historic features and cultural associations;
- A breadth and depth of significant habitats, species and associated natural events;
- An ancient and intricate network of winding lanes, paths and recreational routes;
- Areas of high tranquillity, natural nightscapes, distinctive natural soundscape and visible movement; and
- A variety in the setting to the AONB formed by the marine environment, Plymouth city, market and coastal towns, rural South Hams and southern Dartmoor.

Local Landscape Character

At the local level, the Devon Landscape Character Assessment (DLCA) describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Devon. Additionally, it also sets out strategies and guidelines for the protection, management and planning of the landscape. The Neighbourhood Plan area is entirely located within the 'Plymouth and Modbury Farmlands'⁵¹ character area, which contains the following distinctive characteristics and special qualities of relevance to the Neighbourhood Plan area:

- Gently rolling landform forming an irregular pattern of low hills and valleys;
- Rivers Erme, Yealm, Silverbridge Lake and Lud Brook flowing generally north-south from Dartmoor to the sea along pronounced valleys with flat valley floors; smaller tributary streams in shallower valleys;
- Deciduous woodlands in valleys, with occasional blocks of deciduous and coniferous plantation on higher land; numerous smaller woodlands, copses, riparian and hedgerow trees (particularly oaks) enhancing the well-treed appearance of the landscape;
- Medium to poor soils, mainly supporting pastoral agriculture, with some pockets of arable; scattered orchards throughout the area;
- Semi-natural habitats including woodland, wetland and unimproved grassland;
- Several estates, with parkland locally influencing landscape character (i.e. around Lyneham, Flete and Strode) and occasional hilltop clumps forming landmarks;
- Numerous historic features within the landscape including lanes, tracks and stone bridges;
- The larger settlements of Ivybridge, Modbury and Yealmpton situated along the main roads;
- Network of winding lanes, often sunken, with outward views frequently barred by high hedgebanks;
- Secretive, intimate valleys contrasting with the surrounding more open farmland;
- Parts have high scenic quality and a key role as part of the setting of the South Devon AONB;
- Ancient woodlands, particularly within river valleys; and
- Northern part of the Flete estate, comprising late 19th and early 20th century gardens and pleasure grounds within a wider 18th century parkland of national significance for wildlife due to its large number of veteran trees.

⁵¹ Devon County Council (no date): 'Plymouth and Modbury Farmlands', [online] available to access via: <https://www.devon.gov.uk/planning/planning-policies/landscape/devon-character-areas/south-hams-area-plymouth-and-modbury-farmlands> last accessed [23/09/19]

Within the character area, the landscape character type '3G: River Valley Slopes and Combes' overlaps with the Neighbourhood Plan area boundary⁵².

Tree Preservation Orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity'; the local planning authority will likely take into consideration the following criteria⁵³:

- Visibility: the extent to which the trees or woodlands can be seen by the public; and
- Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

In this regard, there are several designated TPOs within the Neighbourhood Plan area, particularly within the settlement of Modbury in the boundary of Modbury Conservation Area.

Visual Amenity

The views across the parish are an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change can see these views degraded overtime.

In this context, several significant local views have been identified within the parish, shown in **Figure 5.1** (overleaf) along with the landscape designations and the location of TPOs.

Summary of Future Baseline

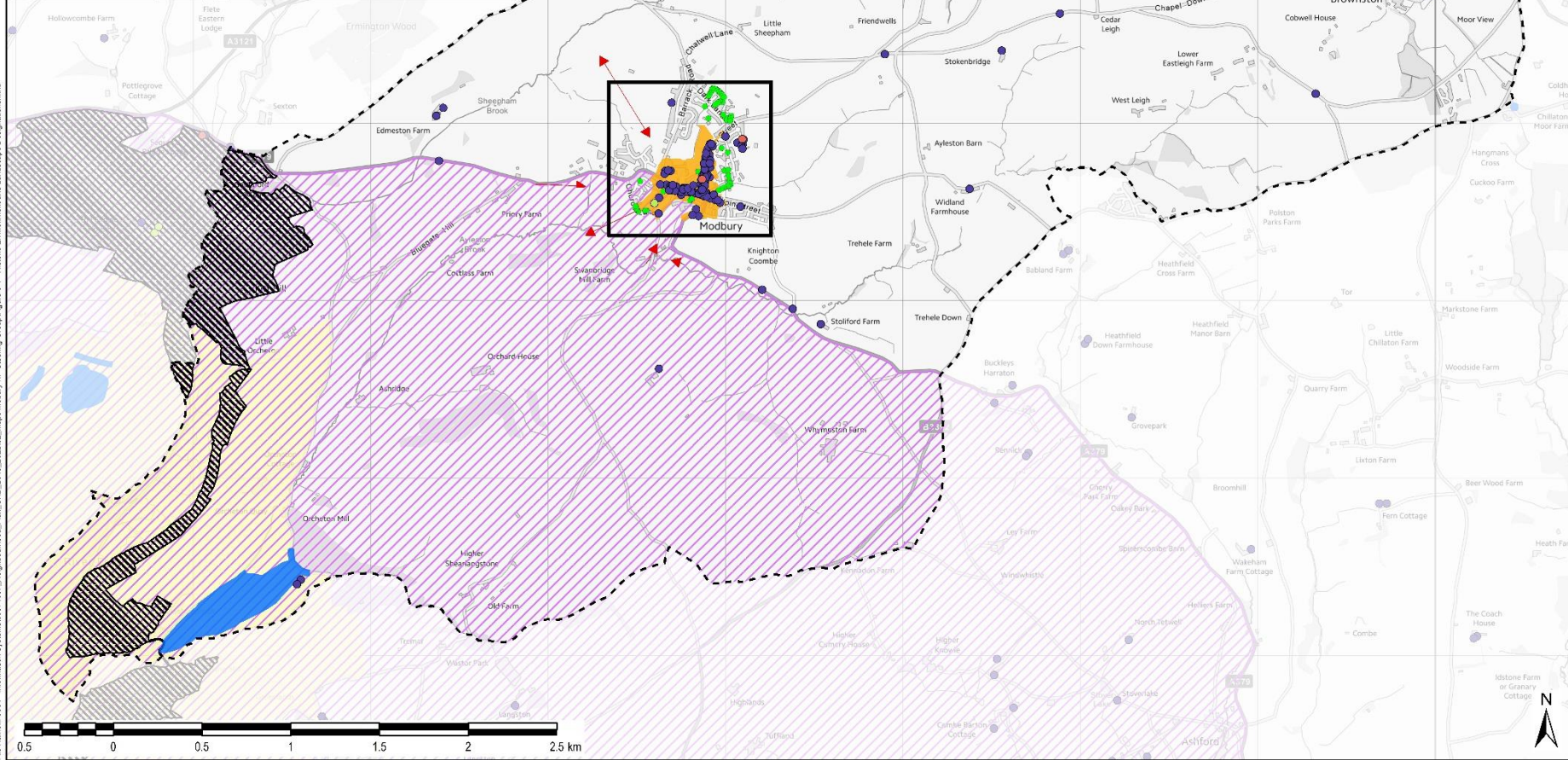
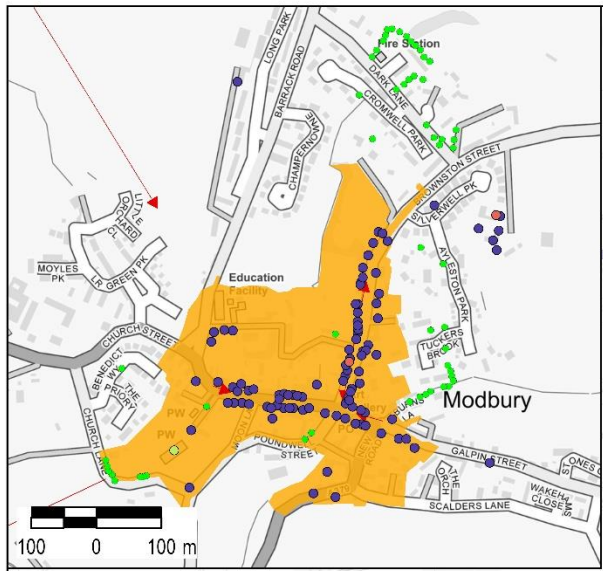
New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

In the absence of the plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character of the LCAs which define the Neighbourhood Plan area, along with the special qualities of the AONB and significant local views within the Neighbourhood Plan area.

⁵² Devon County Council (no date): 'Devon Landscape Character Assessment', [online] interactive map available to access via: <<https://new.devon.gov.uk/planning/planning-policies/landscape/devons-landscape-character-assessment>> last accessed [16/02/18]

⁵³ GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: <<https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>> last accessed [16/04/19]

File Name: I:\504 - Information Systems\657107 - Neighbourhood Plan_CFB_2018_202202 - Megasthony NP Steering Group\Figure 5 - Historic Environment and Landscape Designations.mxd



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LEGEND

- Modbury Neighbourhood Plan Area
- Tree Preservation Order
- Significant Local Views
- Record of Scheduled Monument
- Registered Parks and Garden
- Conservation Area
- South Devon Area of Outstanding Natural Beauty
- Heritage Coast

Listed Building

- Grade I
- Grade II*
- Grade II

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Purpose of Issue: **FINAL**

Client: **MODBURY NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title: **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE MODBURY NEIGHBOURHOOD PLAN**

Drawing Title: **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

Drawn: CN	Checked: JW	Approved: RP	Date: 17/08/2019
AECOM Internal Project No. 60571087		Scale @ A3 1:25,000	

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Drawing Number: **FIGURE 5.1**

Sheet: **01**

A5 – Historic Environment

Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘*positive strategy*’ for the ‘*conservation and enjoyment of the historic environment*’, including those heritage assets that are most at risk.
- ‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Landscape and Historic Environment SEA theme.

The Government’s Statement on the Historic Environment for England⁵⁴ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Historic England is the statutory body that helps people care for, enjoy and celebrate England’s spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)⁵⁵ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁵⁶ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

⁵⁴ HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: <http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx> last accessed [20/0918]

⁵⁵ Historic England (2016): ‘Conservation Area Designation, Appraisal and Management: Advice Note 1’, [online] available to download via: <<https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [11/12/18]

⁵⁶ Historic England (2016): ‘SA and SEA: Advice Note 8’ [online] available to download via: <<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>> last accessed [11/12/18]

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁵⁷ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁵⁸ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

At the local level, Policy DEV21 'Development Affecting the Historic Environment' and Policy DEV24 'Undeveloped Coast and Heritage Coast' within the Plymouth and South West Devon JLP directly relate to the historic environment SEA theme.

Summary of Current Baseline

Historic Character of Modbury

The pre-submission draft version of the Modbury Neighbourhood Plan and the Modbury Conservation Area Appraisal provide a detailed overview of the historic character of the area. The summaries below are taken from these documents and provide context:

"Modbury is mentioned in the Domesday Book and records show permission for a weekly market in the town since the late twelfth century. By the thirteenth century Modbury had been made a borough and two annual fairs are also recorded. The town's population has fluctuated over the centuries, reaching a peak with the prosperity of the wool trade in the eighteenth and nineteenth centuries. This was the basis for the impressive architecture seen in many of the town's older buildings.

"Modbury's history is strongly reflected in its townscape. The layout of the town and the buildings which line its steep streets create a powerful sense of place and the town's special and distinctive character is recognised through the designation of a Conservation Area.

"The first permanent settlement at Modbury could well be evidenced by the high banks encircling the churchyard along Church Lane. These appear to be part of the boundary of an ancient enclosure whose siting above a steep slope is suggestive of a small Iron Age hill fort.

"Most of the town's historic buildings occupy the bottom and steeply rising slopes of a narrow-necked hollow that cuts into the plateau-like setting from the south. Mostly too they're neatly set out on continuous building lines along the lengths of its principle highways - Church Street, Brownston Street and Galpin Street - which descend from the enclosing high ground, west, north and east, to meet at Broad Street on its level plain. Significant aspects of the town's historic development pattern, and its long established relationship with the landscape setting, are captured in views from each of the 'descending' streets.

⁵⁷ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition', [online] available to download via:

<<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>> last accessed [11/12/18]

⁵⁸ Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to download via:

<<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>> last accessed [11/12/18]

“Nearly all street frontage buildings have roof ridges (and therefore eaves) running parallel to the street, so forward-facing gables are very nearly absent. Even at corners, or at sites next to gaps, hips are often used to turn the angle with a continuous eaves line. The steepness of the main streets means that roof ridges are rarely continuous for more than 2 or 3 buildings in a row. Instead they're stepped, and from the lower side the exposed tops of gabled ends are, as here, a characteristic feature.

“Today, Modbury town serves as a local centre providing many services and facilities for the wider parish and the surrounding area. Much of the parish is protected for its natural, architectural or historic value.”

Designated Heritage Assets and Areas

Listed Buildings

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains one Grade I, two Grade II* and 122 Grade II nationally designated listed buildings which are protected through the Listed Buildings and Conservation Areas Act 1990. Most of the Grade II listed buildings are within the settlement of Modbury. The Grade I and Grade II* listed buildings are as follows:

- Church of St. George (Grade I);
- Old Traine East Old Traine West (Grade II*); and
- Chain House (Grade II*);

Scheduled Monuments

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England⁵⁹, there is one scheduled monument within the Neighbourhood Plan area and a further two scheduled monuments within proximity to the Neighbourhood Plan area, namely:

- Iron Age promontory fort known as Oldaport Camp (within the south western section Neighbourhood Plan area, adjacent to the Erme Estuary);
- Slight univallate hillfort known as Holbury Camp, 750m east of Holwell Lodge (approximately 450m to the west of the Neighbourhood Plan area); and
- Bowl barrow on Churchland Green 350m west of Coldharbour Farm (adjacent to the south eastern corner of the Neighbourhood Plan area).

Conservation Areas

Conservation Areas are designated because of their special architectural and historic interest. Conservation Area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England⁶⁰. Ideally, appraisals should be regularly reviewed as part of the management of the Conservation Area and can be developed into a management plan.

Designated in July 1969 and covering most of the built settlement of the town, Modbury Conservation Area contains 98 listed buildings with architectural and historic qualities that contribute to its interest and distinctiveness.

⁵⁹ Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [20/09/2018]

⁶⁰ Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to download from: <<https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>> last accessed [20/09/18]

The Character Area Appraisal⁶¹ provides an overview of the key components, features and structures of special interest, including: houses and cottages of late 19th or early 20th centuries, stone boundary and retaining walls, ironwork railings and gates, gate piers and granite steps, raised and cobbled pavements, a wall mounted 'GR' letter box, granite kerbstones, a K6 telephone kiosk, and Victorian style lamp-posts.

A management plan has not been prepared for Modbury Conservation Area, therefore it is currently not possible to determine whether the area might benefit from positive strategies to protect and enhance its distinctiveness and special qualities.

Registered Historic Parks and Gardens

Registered Parks and Gardens are noted as a fragile and finite resource by Historic England⁶², as they can easily be damaged beyond repair or lost forever. Designated in August 1987 and partly overlapping with the western section of the Neighbourhood Plan area, 'Flete'⁶³ is a Grade II listed park and garden covering an area of approximately 190 ha and comprising 10ha of formal gardens and pleasure grounds, 130ha of parkland and 50ha of woodland. It lies at the tidal limit of the River Erme which flows through a wooded valley estuary and into the English Channel.

Heritage Coast

Heritage Coasts are the finest stretches or undeveloped coastline in England and Wales, with their natural beauty and enjoyment by the public giving them special claim for both protection and sensitive management. In this context, land towards the south western boundary of the Neighbourhood Plan area is within the boundary of the South Devon Heritage Coast, which covers approximately 77% of the AONB coastline. Following guidance from the Countryside Commission, the main objectives for the South Devon Heritage Coast are to⁶⁴:

- Conserve, protect and enhance its natural beauty, including their terrestrial, littoral and marine flora and fauna, and their heritage features of architectural, historical and archaeological interest;
- Facilitate and enhance their enjoyment, understanding and appreciation by the public;
- Maintain and improve (where necessary) the environmental health of the inshore waters affecting the coast and their beaches via appropriate works and management; and
- Take account of the needs of agriculture, forestry and fishing, and of the economic and social needs of the small communities on these coasts.

Heritage at Risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2018 Heritage at Risk Register for South West England⁶⁵ none of the heritage assets within or adjacent to the Neighbourhood Plan area considered to be 'at risk'.

However, it is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether the two Grade II listed buildings within the Neighbourhood Plan area are at risk.

Figure 5.1 (above) shows the location of the scheduled monuments, listed buildings, registered park and garden, and conservation area within the Neighbourhood Plan area.

⁶¹ South Hams District Council (no date): 'Modbury Conservation Area Appraisal', [online] available to access via: <<https://www.southhams.gov.uk/article/3469/Conservation-Area-Appraisals-and-Management-Plans>> last accessed [20/09/19]

⁶² Historic England (2017): 'Registered Parks and Gardens' [online] available at: <<https://www.historicengland.org.uk/listing/what-is-designation/registered-parks-and-gardens/>> last accessed [04/09/19]

⁶³ Historic England (2019): 'Flete Park and Garden', [online] available to access via: <<https://historicengland.org.uk/listing/the-list/list-entry/1000692>> last accessed [23/09/19]

⁶⁴ South Devon AONB (2014): '2014-2019 Management Plan, Section 3.6: South Devon Heritage Coast', [online] available to download via: <<http://www.southdevonaonb.org.uk/about-the-aonb/looking-after-the-aonb/aonb-management-plan>> last accessed [15/02/18]

⁶⁵ Historic England (2018): 'Heritage at Risk Register for South West England', [online] available to download at: <<https://historicengland.org.uk/images-books/publications/har-2018-registers/>> last accessed [23/09/19]

Locally important Heritage Features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people.

Following a high-level review of the Historic Environmental Record (HER) for Devon and Dartmoor (accessed via the Heritage Gateway)⁶⁶, there are 378 records within Modbury Parish including a variety of structures and archaeological finds which positively contribute to the historic character of the Neighbourhood Plan area.

Summary of Future Baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the village and better reveal assets' heritage significance.

A6 – Land, Soil and Water Resources

Context Review

The EU's Soil Thematic Strategy⁶⁷ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Implemented in 2016, the South West River Basin District Management Plan⁶⁸ aims to provide a framework for protecting and enhancing the benefits provided by the water environment. Principally, by 2021 the Management Plan predicts that an additional 44 water bodies will have achieved 'good' status. The Neighbourhood Plan area is located within the 'South Devon' catchment area, with the following three themes considered to be the priority management issues for this catchment area within the River Basin District Management Plan:

⁶⁶ Heritage Gateway (2019): Historic Environmental Record for Cornwall', [online] available to access via: <<http://www.heritagegateway.org.uk/gateway/>> last accessed [02/09/19]

⁶⁷ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [29/06/18]

⁶⁸ GOV.UK (2016): 'South West River Basin District Management Plan', [online] available to download via: <<https://www.gov.uk/government/publications/south-west-river-basin-district-river-basin-management-plan>> last accessed [19/02/18]

- Agricultural and non-agricultural diffuse pollution;
- Point source pollution; and
- Habitats and conservation.

Key messages from the NPPF include:

- ‘Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - i. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
 - ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.’*
- Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
- ‘Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.’
- ‘Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.’
- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Land, Soil and Water Resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England⁶⁹, which sets out a vision for soil use in England, and the Water White Paper⁷⁰, which sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England⁷¹ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

⁶⁹ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [20/09/18]

⁷⁰ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [20/09/18]

⁷¹ Defra (2011) Government Review of Waste Policy in England [online] available at: <<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [20/09/18]

In terms of waste management, the Government Review of Waste Policy in England⁷² recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The National Waste Management Plan⁷³ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁷⁴. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

At the local level, Policy DEV2 'Air, Water, Soil, Noise, Land and Light' and Policy DEV31 'Waste Management' within the Plymouth and South West Devon JLP directly relate to the land, soil and water resources SEA theme.

The Devon Minerals Plan (2011 – 2031) was adopted in February 2017 and contains the Council's vision and objectives for minerals planning and provides the policy framework and site proposals to maintain the supply of minerals and limit the impacts of their working. The Minerals Plan has regard to national minerals policy, while addressing the specific characteristics of Devon and its minerals⁷⁵.

Summary of Current Baseline

Soil Resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, a detailed classification has been undertaken in the central section of the Neighbourhood Plan area. Of this patch of land that has been classified, the majority has been classified as Grade 3b, 'Grade 4' or 'Other' with small patches of 'Grade 5'. However, there are also three patches of land which have been classified as 'Grade 3a' towards the north of the Neighbourhood Plan area. Two of these patches lie to the north and east of the main built up area of Modbury.

At the local level a detailed classification has not been undertaken for most of the Neighbourhood Plan area. The Provisional Agricultural Land Quality dataset⁷⁶ shows that the Neighbourhood Plan area is predominantly covered by Grade 3 agricultural land, however; without the subset grading (3a or 3b) it is not possible to tell at this stage whether the agricultural land is considered to be 'best and most versatile'.

It is also important to note that the national dataset is of very low resolution and may not necessarily provide an accurate reflection of the agricultural land quality within the Neighbourhood Plan area. However, based on the results of the 'Predictive BMV Land Assessment'⁷⁷, most of the undeveloped areas surrounding Modbury have a low likelihood (less than or equal to 20%) of containing BMV land. There is a small area of land in the south western section of the Neighbourhood Plan area which has a moderate likelihood of containing BMV land (20-60% likelihood).

Water Resources

⁷² DEFRA (2011) Government Review of Waste Policy in England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf [accessed 01/03/19]

⁷³ DEFRA (2013) Waste Management Plan for England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf [accessed 01/03/19]

⁷⁴ Directive 2008/98/EC

⁷⁵ Devon County Council (2017): 'Devon Minerals Plan', [online] available to access via: <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-minerals-plan> last accessed [23/09/19]

⁷⁶ Natural England (2018) Agricultural Land Classification map London and the South East (ALC007) [online] available at <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736> [accessed 09/01/19]

⁷⁷ Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map for the South West' [online] available to access via: <http://publications.naturalengland.org.uk/category/5208993007403008> last accessed [23/09/19]

The main watercourse flowing through the Neighbourhood Plan area is the River Erme which flows along the western boundary into the English Channel. Sheephams Brook and Ayleston Brook are tributaries of the River Erme and flow south west through the central section of the Neighbourhood Plan area, before connecting to the River Erme.

Completed in 2016, the SFRA addendum for South Hams provides the following summary for the ordinary watercourses flowing through the Neighbourhood Plan area:

“The Ayleston Brook flows in a westerly direction to the south of Modbury. Two unnamed tributaries of the Ayleston Brook flow through Modbury. The larger of the two enters Modbury to the east, close to Ayleston Park, before flowing in a south westerly direction through the centre of Modbury and meeting the Ayleston Brook close to Swanbridge Mill Farm. The smaller tributary originates close to Cromwell Park and flows in a southerly direction through open space between Barracks Road and Brownston Street. It then flows in culvert beneath Church Street before joining the larger tributary to the south of Modbury. Both tributaries are partially culverted through Modbury.”

The Neighbourhood Plan area is not located within a Groundwater Source Protection Zone (SPZ) or a Nitrate Vulnerable Zone (NVZ).

Water Quality

Modbury is located within the South West River Basin District in the Erme Operational Catchment, which is part of the wider Devon South Management Catchment. The Erme Operational Catchment contains seven waterbodies, three of which fall in the Neighbourhood Plan area. These are: Ayleston Brook, Sheephams Bk and Lower Erme.

Based on the most recently completed water quality assessments undertaken in 2016, the Environment Agency's Catchment Data Explorer⁷⁸ highlights the following trends:

- Ayleston Brook⁷⁹ was classified as having a 'good' chemical status and a 'moderate' ecological status, with an overall classification of 'moderate'. The reasons for not achieving good status (RNAGs) are primarily attributed to the following activities: sewage discharge and riparian / in-river activities (including bankside erosion).
- Sheephams Bk⁸⁰ was classified as having a "good" chemical status and a 'good' ecological status and therefore received an overall classification of 'good'.
- The Lower Erme⁸¹ was classified as having a 'fail' chemical status and a 'moderate' ecological status, with an overall classification of 'moderate'. The RNAGs are primarily attributed to the following activities: farm / site infrastructure, riparian / in-river activities (including bankside erosion) and sewage discharge.

Mineral Resources

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance⁸².

In this context, the Devon Minerals Plan features the introduction of Mineral Safeguarding Areas (MSA) which aim to secure valuable mineral resources from sterilisation by new development. There are no MSAs within or adjacent to the Neighbourhood Plan area as shown on Devon County

⁷⁸ Environment Agency (2019): 'Catchment Data Explorer', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/>> [accessed 04/09/19]

⁷⁹ Environment Agency (2019): 'Ayleston Brook Overview', [online] available to access via: <<http://environment.data.gov.uk/catchment-planning/WaterBody/GB108046005020>> last accessed [23/09/19]

⁸⁰ Environment Agency (2019): 'Sheephams Bk Overview', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB108046005070>> last accessed [23/09/19]

⁸¹ Environment Agency (2019): 'Lower Erme Overview', [online] available to access via: <<https://environment.data.gov.uk/catchment-planning/WaterBody/GB108046005040>> last accessed [23/09/19]

⁸² GOV.UK (2014): 'Minerals Guidance', [online] available to access via: <<https://www.gov.uk/guidance/minerals>> last accessed [04/09/19]

Council's minerals policy map⁸³. There is an 'Aggregate' MSA located approximately 3km to the west, covering the settlement of Yealmpton.

Summary of Future Baseline

Future development has the potential to affect water quality through diffuse pollution, waste water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

Due to the prevalence of BMV agricultural land within some sections of the undeveloped areas surrounding Modbury, new developments which are located outside of the existing town could potentially lead to losses of higher quality (best and most versatile) agricultural land.

A7 – Population and Community

Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'
- To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁸⁴ warns that society is underprepared for an ageing population. The report

⁸³ Devon County Council (2019): 'Mineral Plan Policies: Interactive Map', [online] available to access via: <<http://map.devon.gov.uk/dccviewer/DevonMineralsPlanPoliciesMap/>> last accessed [23/09/19]

states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

The Plymouth and South West Devon Joint Local Plan 2014-2034 has a range of policies which are related to population and community, including:

- Policy SPT1 'Delivering Sustainable Development'
- Policy TTV2 'Delivering Sustainable Development in the Thriving Towns and Villages';
- Policy TTV24 'Site Allocations in the Smaller Towns and Key Villages';
- Policy DEV8 'Meeting Local Housing Need in the Smaller Towns and Key Villages';
- Policy DEV18 'Protecting Local Shops and Services'; and
- Policy DEV20 'Place Shaping and the Quality of the Built Environment'.

Summary of Current Baseline

Population

The population of Modbury increased at a higher rate between 2001 and 2011 in comparison to the totals for South Hams, the South West of England and England. Approximately 2.0% of the Neighbourhood Plan area live within South Hams⁸⁵.

Age Structure

Generally, there are a higher proportion of residents within the 60+ age category within the Neighbourhood Plan area (31.7%) in comparison to the totals for the South West of England (26.4%) and England (22.3%). However, this total is similar to the percentage for South Hams (32.8%).

A lower proportion of residents are within the working age categories (25-44 and 45-59) in the Neighbourhood Plan area (41.9%) in comparison to the totals for the South West of England (44.7%), South Hams (42.5%) England (46.9%)⁸⁶.

Additionally, 26.4% of residents within the Neighbourhood Plan area are within the younger age categories (0-15 and 16-24), higher than the total for South Hams (24.8%), but lower than the totals for the South West of England (28.9%) and England (30.8%).

Household Deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

⁸⁴ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [21/09/18]

⁸⁵ ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

⁸⁶ ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

Based on 2011 Census data, fewer households are deprived in one or more dimensions within the Neighbourhood Plan area (49.5%) in comparison to the total for South Hams (52.2%), the South West of England (55.2%) and England (57.5%). Out of the 49.5% of households which are deprived in the Neighbourhood Plan area, the majority are deprived in one or two dimensions, which is similar to the regional and national trends⁸⁷.

Index of Multiple Deprivation

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
 - a. 'Geographical Barriers': relating to the physical proximity of local services
 - b. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
 - c. 'Indoors Living Environment' measures the quality of housing.
 - d. 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 1. Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
 2. Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)⁸⁸ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

The Neighbourhood Plan area is within the South Hams 008B LSOA, which is amongst the top 30% least deprived LSOAs in England based on the 'Overall IMD' domain. However, the LSOA is amongst the top 30% most deprived areas within the 'Living Environment' domain.

⁸⁷ ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

⁸⁸ DCLG (2015): Indices of Deprivation Explorer', [online] available to access via: <http://dclgapps.communities.gov.uk/imd/idmap.html> last accessed [02/09/19]

Housing Tenure

Within the Neighbourhood Plan area, 71.1% of residents either own their home outright or with a mortgage, higher than the totals the South West of England (67.4%) and England (63.3%), but similar to the total for South Hams (71.7%).

A lower proportion of residents live within privately rented and social rented housing in the Neighbourhood Plan area in comparison to the regional and national trends⁸⁹.

A slightly lower percentage of residents in the Neighbourhood Plan area live in rent-free accommodation or shared ownership accommodation in comparison to the regional and national trends.

Education

Based on the 2011 Census data, 15.9% of residents in the Neighbourhood Plan area have no qualifications, lower than the totals for South Hams (17.2%), the South West of England (20.7%) and England (22.5%)⁹⁰.

Comparatively, 35.5% of residents within the Neighbourhood Plan area have a Level 4 qualification or above, which broadly aligns to the total for South Hams (34.3%) but is higher than the totals for the South West of England (27.4%) and the total for England (27.4%).

Employment

Regarding employment within the Neighbourhood Plan area, the following three occupation categories support the most residents⁹¹:

- Professional occupations (21.2%);
- Skilled trades occupations (17.5%); and
- Managers, directors, senior officials (14.0%).

Overall, 52.7% of residents within the Neighbourhood Plan area are employed in one of the above three occupation categories, broadly aligning to the total for South Hams (48.7%) but greater than the totals for the South West of England (40.9%) and England (39.9%).

Community Assets

The Neighbourhood Plan area has a range of local community facilities which serve the needs of the local community and play a vital role in supporting the Parish's sense of identity. Such facilities include: shops, pubs, primary school, St George's Church, allotments, the Memorial Hall, GP surgery and local recreational facilities.

Additionally, there are 19 areas of land which the Neighbourhood Plan proposes to designate as local green spaces, including the Millennium Meadow, Little Meadow Hill and Dogapit Meadow. Such areas are demonstrably special to a local community, for example: because of their beauty, historic significance, recreational value and/or biodiversity value.

Summary of Future Baseline

As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community and economy of certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Joint Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

⁸⁹ ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

⁹⁰ ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

⁹¹ ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

A8 – Health and Wellbeing

Context Review

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; ‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’
- ‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁹² (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

The policies contained in Chapter 3 ‘Connecting people with the environment to improve health and wellbeing’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the health and wellbeing SEA theme.

The Plymouth and South West Devon Joint Local Plan 2014-2034 has a range of policies which are related to health and wellbeing, including:

- Policy DEV1 ‘Protecting Health and Amenity’;
- Policy DEV3 ‘Sport and Recreation’;
- Policy DEV4 ‘Playing Pitches’;
- Policy DEV5 ‘Community Food Growing and Allotments’;
- Policy DEV10 ‘Delivering High Quality Housing’; and
- Policy DEV27 ‘Green and Play Spaces’.

⁹² The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: < <https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf> > last accessed [24/09/18]

Summary of Current Baseline

Joint Strategic Needs Assessment

The Joint Strategic Needs Assessment (JSNA) for Devon identifies key features of interest within the area and raises important issues for discussion. The main challenges in Devon are linked to population, equality and diversity, economy, community and environment, deprivation, starting well, living well and ageing well.

Published in June 2018, the JSNA district profile for the South Hams⁹³ outlines the following key trends for the area:

- In 2018, 13.3% of children in South Hams were identified as having learning difficulties or disabilities that make it harder for them to learn than most children of the same age. This is lower than the total percentage for Devon (16.9%).
- In 2017, 77.7% of school pupils in the South Hams achieved five or more GCSEs at Grades A*-C, higher than the totals for Devon (65.0%), the South West of England (57.1%) and England (56.3%).
- In 2016, 4.7% of residents were receiving employment support allowance or incapacity benefit, broadly aligning to the total for Devon (5.3%) but higher than the totals for the South West of England (3.1%) and England (3.4%).
- The estimated percentage of residents in the South Hams (aged 16 and over) that are regular smokers is approximately 11.5%.
- The estimated percentage of residents in the South Hams (aged 16 and over) with a Body Mass Index (BMI) of 30 or more is approximately 30.2%.
- The estimated percentage of residents in the South Hams (aged 16 and over) who complete less than 30 minutes of moderate physical exercise per week is approximately 21.5%.
- Approximately 26.0% of residents reported a low happiness score, with a further 20.7% reporting a low life satisfaction score.
- Approximately 5.6% of residents aged 60 and over are living with dementia.

Health indicators and deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality, living environment, income and employment previously discussed in detail in Chapter 8.

Based on 2011 Census data⁹⁴, 83.3% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', greater than the totals for South Hams (81.8%), the South West of England (81.4%) and England (81.4%).

Additionally, 4.3% of residents in the Neighbourhood Plan area consider themselves to have 'bad health' or 'very bad health', lower than the totals for South Hams (4.9%), the South West of England (5.2%) and England (5.4%).

The total percentage of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' is slightly lower than the totals for South Hams, the South West of England and England, 81.5% of residents in the Neighbourhood Plan area confirm that their activities are 'not limited'. This is similar to the totals for South Hams (80.8%), the South West of England (81.6%) and England (82.4%)⁹⁵.

⁹³ Devon County Council (2018): 'JSNA District Profile for the South Hams', [online] available to access via: <<https://www.devonhealthandwellbeing.org.uk/jsna/profiles/districts/>> last accessed [23/09/19]

⁹⁴ ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

⁹⁵ ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

Summary of Future Baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good. However, a slightly higher percentage of residents within Modbury (and across the South Hams) report that their activities are limited in some way, when compared to the regional and national trends.

An ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population and tourists).

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

A9 – Transportation

Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Key messages from the NPPF include:

- ‘Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - i. *The potential impacts of development on transport networks can be addressed*
 - ii. *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*
 - iii. *Opportunities to promote walking, cycling and public transport use are identified and pursued*
 - iv. *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*
 - v. *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*
- ‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. The Local Transport Plan 2011-2026 for Devon and Torbay aims to deliver a transport system to meet economic, environmental and social challenges. The plan is seeking to deliver the aspirations of Devon and Torbay councils, stakeholders, businesses and the public. To achieve Devon and Torbay’s vision the strategy has five key objectives:

- ‘Deliver and support new development and economic growth;
- Make best use of the transport network and protect the existing transport asset by prioritising maintenance;
- Work with communities to provide safe, sustainable and low carbon transport choices;
- Strengthen and improve the public transport network; and
- Make Devon the ‘Place to be naturally active’.

At the local level, Policy DEV29 'Specific Provisions Relating to Transport' within the Plymouth and South West Devon JLP directly relates to the transportation SEA theme.

Summary of Current Baseline

Rail network

The Neighbourhood Plan area is not directly connected to the rail network, with no stations located within its boundaries.

The nearest railway station to the Neighbourhood Plan area is in Ivybridge, located approximately 8km to the north. Ivybridge station is a calling point for intermediate services between Cornwall, Plymouth, Exeter and London Paddington.

A wider range of services are available from Totnes station.

Bus network

Regarding the local bus network, there is an hourly service between Plymouth and Kingsbridge from Modbury, along with a daily service between Plymouth and Bigbury-on-Sea and a daily service between Mothecombe and Lee Mill. Additionally, there is a weekly 'hopper' bus service to a local supermarket in Lee Mill.

Road network and congestion

The A379 forms the main highway through Modbury, connecting residents to the settlements of Kingsbridge via Aveton Gifford (to the south east) and Plymouth, Yealmpton and Brixton (to the west). Within the Neighbourhood Plan area, the A379 experiences congestion due to its narrow and steep nature, particularly at peak times of the day (i.e. rush hours and weekends). Congestion issues are heightened due to several turnings from side-roads onto the A379 and pedestrian crossings.

Regarding pedestrian safety, a recent survey completed which was prepared by the Neighbourhood Plan Steering Group received the following responses from residents:

- 645 residents expressed concerns over the lack of provision for a safe crossing at the top of Church Street and for a pavement on the south side of Palm Cross linking it to the War Memorial.
- 394 residents expressed concern at crossing from the Co-op to the south side of Broad Street/New Road as well as crossing the A379 at the bottom of Scalders Lane.
- There was a perceived problem in relation to the lack of pavements on Barracks Road, Dark Lane, to the recreation ground, Middle Traine on Brownston Street, Church Lane, New Road, Bunkers Hill, Poundwell Street and Scalders Lane.
- The dangers for school children walking to and from the primary school and for those catching school buses was noted by parents as a continuing worry.

Cycle and footpath network

National Cycle Network⁹⁶ Route 28 passes through the Neighbourhood Plan area and runs from Okehampton to Plymouth via the settlements of Moretonhampstead, Newton Abbot, Totnes and Salcombe. Likewise, the parish also has a well-developed public rights of way network connecting residents to local services and facilities.

The Erme-Plym trail is located approximately 2km to the west of the town and extends between the settlements of Ivybridge, Ermington, Yealmpton and Brixton, eventually connecting to Plymouth (via the residential areas of Staddiscombe, Hooe and Turnchapel) where it joins the South West Coast Path⁹⁷.

⁹⁶ Sustrans (2019): 'National Cycle Network Map', [online] available to access via: <<https://www.sustrans.org.uk/national-cycle-network/>> last accessed [23/09/19]

⁹⁷ Bing (2019): 'Bing Maps: Ordnance Survey Viewer', [online] available to access via: <<https://www.bing.com/maps/>> last accessed [23/09/19]

Availability of cars and vans

Based on 2011 Census data, 87.7% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for South Hams (86.7%), the South West of England (81.1%) and England (74.2%). The total number of households in the Neighbourhood Plan area with access to at least two cars or vans is higher than the regional and national trends⁹⁸.

Travel to work

The most popular method of travelling to work in the Neighbourhood Plan area is via driving a car or van (42.7%) which is slightly higher than the totals for South West (41.1%), the South West of England (41.4%) and England (37.0%).

10.9% of residents in the Neighbourhood Plan area either catch a train, bus, minibus, coach or walk to work. This is lower than the percentage for South Hams (11.5%), the South West of England (13.2%) and England (15.0%)⁹⁹.

Summary of Future Baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes (particularly the A379). This is likely to continue to be more pronounced at weekends and during peak times of year (i.e. holiday seasons, rush hour) due to the influx of visitors and commuters passing through the area. This is particularly significant in the local context, due to the pressures from narrow roads, steep incline, vehicle type and the stop-start effect created by parked cars at certain locations.

⁹⁸ ONS (no date): 'Car or Van Availability 2011', (Table QS416EW)

⁹⁹ ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

