



Strategic Environmental Assessment for the South Milton Neighbourhood Plan

Environmental Report to accompany the Submission
version of the Neighbourhood Plan

November 2017

Quality information

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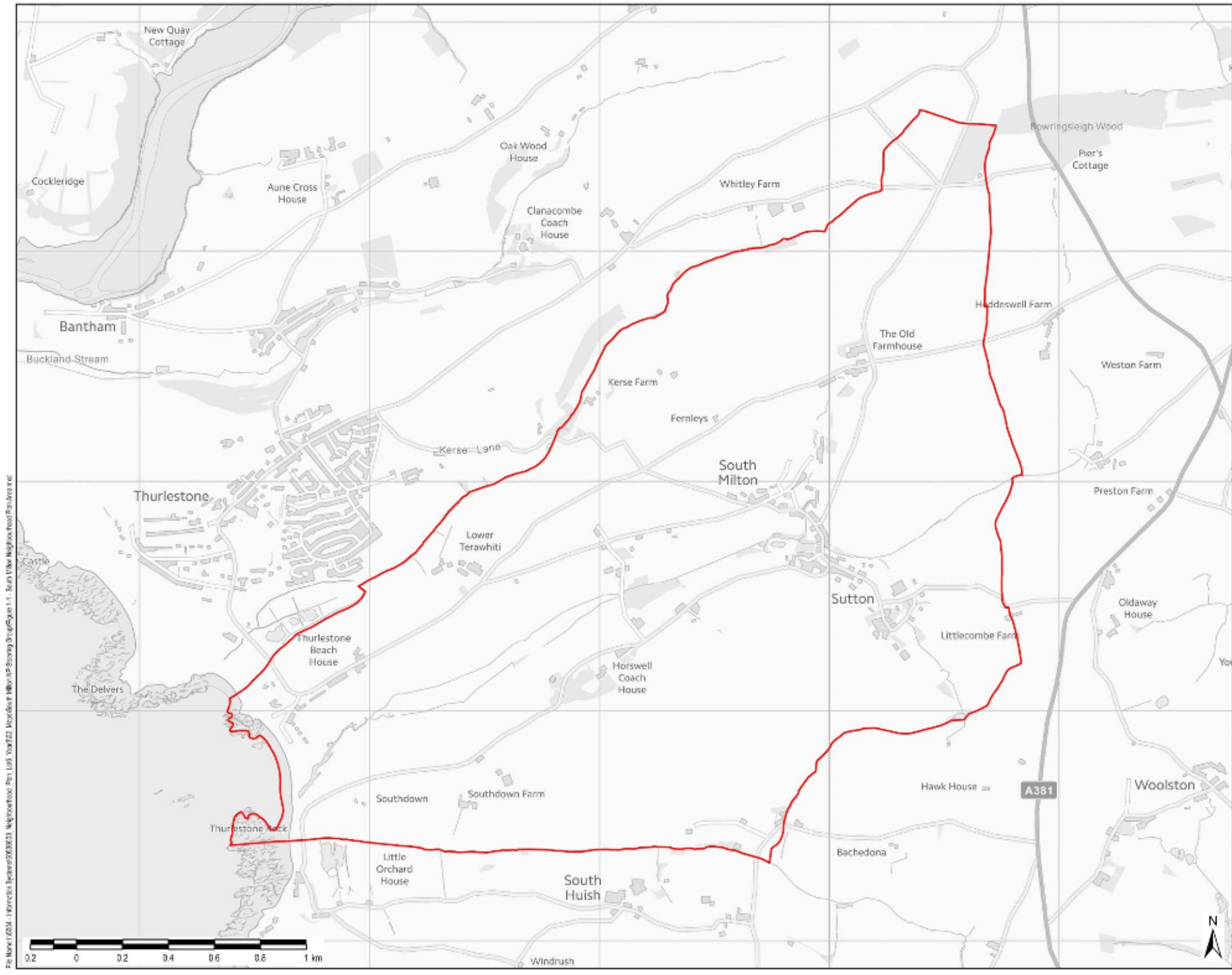
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South Milton Neighbourhood Plan Area

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Non-Technical Summary

What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the South Milton 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 South Milton Neighbourhood Plan?

The South Milton Neighbourhood Plan presents a plan for the administrative area of South Milton Parish for the period to 2034. Prepared to be in conformity with the emerging Plymouth and South West Devon Joint Local Plan it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, housing, community facilities and the protection and enhancement of the environment.

It is currently anticipated that the Neighbourhood Plan will undergo a referendum in 2018.

Purpose of this Environmental Report

This Environmental Report, which accompanies the current consultation on the SMNP, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (June 2017), 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 SMNP 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 SMNP 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 SMNP has been assessed;
- The appraisal of alternative approaches for the SMNP;
- The likely significant environmental effects of the SMNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the SMNP; and
- The next steps for the SMNP and accompanying SEA process.

Assessment of alternative approaches for the SMNP

The Neighbourhood Plan has been prepared in the conjunction with the provisions of the emerging Plymouth and South West Devon Joint Local Plan (JLP), which will supersede the South Hams Local Development Framework and cover the time period up until the year 2034.

The latest version of the JLP does not identify sites for development within South Milton, but takes an approach which aims to enable development to come forward in the village. As such the JLP indicates that the South Milton Neighbourhood Plan area has the potential to accommodate around ten extra dwellings over the plan period, in order to limit the potential impact on the sensitive South Devon AONB landscape.

In light of this, the Neighbourhood Plan seeks to allocate housing in the Neighbourhood Plan area, with a view to supporting the vitality of South Milton and promoting growth which meets local housing needs and provides community facilities.

To help shape decision making on the location of housing in the Neighbourhood Plan area, the Neighbourhood Plan Steering Group sought to explore different options for the location and tenure of housing. To support decision making on this element of plan making, the SEA process assessed three sets of options.

A first consideration was where, in broad terms, to facilitate new housing provision in the area. Two main areas of the Neighbourhood Plan area are currently developed. South Milton village and Sutton comprise the main settlement in the Neighbourhood Plan area. An additional built up area is the coastal part of the parish close to South Milton Sands. Two alternative approaches linked to the broad location of development in the Neighbourhood Plan area were therefore appraised through the SEA process. These were as follows:

- **Option 1:** Enable new housing provision within the coastal part of the parish.
- **Option 2:** Focus new housing provision in the areas covered by South Milton village and Sutton.

To further support the intention of the Neighbourhood Plan to shape new development within the Neighbourhood Plan area, additional potential options were then considered, namely whether to 1) focus development on existing previously developed 'brownfield' sites in South Milton Parish or 2) widen the scope of the Neighbourhood Plan to consider development on previously undeveloped 'greenfield' sites 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:

- **Option A:** Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in the Neighbourhood Plan area 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 the assessment of the above three sets of options are presented in Chapter 4 of this Environmental Report.

Following the preparation of an initial draft of the Neighbourhood Plan, the draft plan underwent an initial assessment through the SEA in summer 2017. Following the assessment of the draft plan, a number of recommendations were made designed to improve the sustainability performance of the proposed policies. These recommendations can be summarised as follows:

- Additional provision should be included in plan policies to support the protection and enhancement of the South Milton SSSI.
- There is the potential to include additional policy wording to more strongly emphasise the need to enhance ecological linkages and networks in the Neighbourhood Plan area.
- There is the potential to include additional policy wording to more directly recognise the 'Special Qualities' of the South Devon AONB and the need for new development proposals to reflect the provisions of the South Devon AONB Management Plan.
- Policies should seek to deliver green infrastructure enhancements in conjunction with existing green infrastructure work being carried out by South Hams District Council, Devon County Council, Natural England and other organisations, including in relation to the South Hams Green Infrastructure Framework.

The draft Neighbourhood Plan was then updated to take into account of these recommendations.

Assessment of the current version of the SMNP

The current consultation version of the SMNP presents 12 planning policies for guiding development in the South Milton area.

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

- Biodiversity and geodiversity;
- Climate change;
- Historic environment and landscape;
- Land, soil and water resources;
- Population and community;
- Health and wellbeing; and
- Transportation.

The assessment has concluded that the current version of the SMNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' sustainability themes. These benefits largely relate to the SMNP's focus on delivering housing which meets local needs, enhancing the quality of life of residents, including through its focus on improving community infrastructure in the Neighbourhood Plan area and enhancing accessibility to the coast. In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing landscape and villagescape character and the setting of the historic environment, leading to **significant positive effects** in relation to the 'landscape and historic environment' theme.

The current version of the SMNP will initiate a number of beneficial approaches regarding the 'biodiversity', 'land, soil and water resources', 'climate change' and 'transportation' sustainability themes. However these are not 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

The SMNP and this Environmental Report has been submitted to South Hams District Council for its consideration. South Hams District Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the SMNP meeting legal requirements and its compatibility with the Local Plan.

If the subsequent Independent Examination is favourable, the SMNP will be subject to a referendum, organised by South Hams District Council. If more than 50% of those who vote agree with the plan, then it will be passed to South Hams District Council with a request it is adopted. Once adopted, the SMNP will become part of the Development Plan for South Milton Parish.

1. Introduction

1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging South Milton Neighbourhood Plan (SMNP).

The SMNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which includes the administrative area of South Milton Parish (Figure 1.1), is being prepared in the context of the emerging Plymouth and South West Devon Joint Local Plan.

The SMNP was submitted to South Hams District Council in November 2017.

Key information relating to the SMNP is presented in Table 1.1.

Table 1.1: Key facts relating to the South Milton Neighbourhood Plan

Name of Qualifying Body	South Milton Parish Council
Title of Plan	South Milton Neighbourhood Plan Steering Group
Subject	Neighbourhood Planning
Purpose	<p>The South Milton 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 South Milton Neighbourhood Plan will be used to guide and shape development within the South Milton Neighbourhood Plan area.</p>
Timescale	To 2034
Area covered by the plan	The Neighbourhood Plan area covers the parish of South Milton in south Devon (Figure 1.1).
Summary of content	The South Milton Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Tim Lewis, South Milton Neighbourhood Plan Steering Group</p> <p>Email address: tim.b.lewis@gmail.com</p>

1.2 SEA explained

The SMNP has been screened in by South Hams District Council as requiring an SEA due to the potential for significant environmental effects from site allocations within the Neighbourhood Plan area.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the SMNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with 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) Directive¹.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
 - 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
 - i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

¹ Directive 2001/42/EC

1.3 Structure of this Environmental Report

This document is the Environmental Report for the SMNP and hence needs to answer all four of the questions listed above 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 Environmental Report In order to meet regulatory² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ³
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's the scope of the SEA? 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 draft 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.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ 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 SMNP

2.1 Local Plan context for the SMNP

The South Milton Neighbourhood Plan is being prepared in the context of the emerging Plymouth and South West Devon Joint Local Plan (JLP), which will supersede the South Hams Local Development Framework and cover the time period up until the year 2034. The JLP will set out the overarching strategy for the area, setting out where development will take place, what areas should be protected and how the area will change. It brings together previous work that has already been carried out by the three councils on South Hams 'Our Plan', West Devon's 'Our Plan' and the Plymouth Plan⁴. The JLP was submitted to the Planning Inspectorate for Examination in July 2017.

The submission version of JLP outlines a spatial strategy for Plymouth and South West Devon through setting out provisions for the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. The South Milton Neighbourhood Plan area is within the latter area.

Strategic Objective S09 within the JLP aims to enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified within the areas covered in the JLP, including South Milton. Policy TTV30 supports this strategic objective, aiming to empower local residents to create strong and sustainable communities, with the preparation of Neighbourhood Plans as a means of identifying local development needs within the villages

Notably, the latest JLP does not identify sites for development within the villages defined as 'sustainable villages', including South Milton, but takes an approach which aims to enable development to come forward in these villages which reflects their sustainability. Through this approach, it seeks to achieve a balance so that development maintains and improves the viability of the villages whilst also being of an appropriate scale – respecting their character and in particular, any landscape designations such as Areas of Outstanding Natural Beauty (AONBs).

As such, the submission version of the JLP indicates that the South Milton Neighbourhood Plan area has the potential to accommodate around ten extra dwellings over the plan period, in order to limit the potential impact on the sensitive South Devon AONB landscape which covers the whole Neighbourhood Plan area.

Neighbourhood plans will form part of the development plan for the district, alongside, but not as a replacement for the Local Plan. The Joint Local Plan 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 South Hams District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

⁴ Plymouth and South West Devon (2016): 'Joint Local Plan Newsletter – July 2016', [online] available to access via: <https://content.govdelivery.com/accounts/UKSWDEVON/bulletins/152f75e> last accessed [08/03/17]

2.2 Vision for the South Milton Neighbourhood Plan

The vision for the SMNP, which was developed during earlier stages of plan development, is as follows:

“

By 2034 we would like South Milton to be an even better place in which to live and work, with a strong sense of identity and community spirit. Our ambition is to protect and enhance our coastline and the rural nature of the parish

Vision for the South Milton Neighbourhood Plan

”

To support the Neighbourhood Plan's vision, the SMNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in **Chapter 5** of this Environmental Report.

3. The Scope of the SEA

3.1 SEA Scoping Report

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.⁵ These authorities were consulted on the scope of the SMNP SEA in May 2017.

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.

Baseline information (including the context review and baseline data) is presented in **Appendix A**.

Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 2.1**.

⁵ 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 programmes’.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England Corine Dyke, Lead Adviser, Sustainable Development Team – Devon, Cornwall and Isles of Scilly	
We welcome the Strategic Environmental Assessment scoping report for the South Milton Neighbourhood Plan	Comment noted.
We recommend that the climate change chapter makes explicit reference to the need for biodiversity to adapt to climate change in the future. This includes the need to provide space for biodiversity to adapt. We acknowledge that the last Assessment Question in the climate change chapter refers to biodiversity resilience but we suggest that you add the following words 'and providing space for biodiversity to adapt to future climate change', or similar wording.	The assessment question has been updated as suggested to reflect comment.
Under landscape and historic environment we note that the assessment question re conserving and enhancing the conservation area is repeated. Might this unbalance the weight given to the conservation area and the weight given to the AONB?	It can be confirmed that additional mention of similar issues will not unbalance the appraisal towards any particular element. In this context each option/proposal will be considered on their individual merits with regard to the appropriateness of the element being considered.
Historic England David Stuart, Historic Places Adviser South West	
In previous liaison with both the local community and South Hams District Council we have drawn attention to the potential which site allocation/identification may have for generating significant environmental effects. I attach that correspondence for information.	Comment Noted. The Neighbourhood Plan has been screened in on the basis of the potential for significant environmental effects.
We are not clear about the basis for the Council determining that an SEA is required for this Plan although we appreciate that it may relate to the quantum of new housing which the Plan aspires to exceeding that which the emerging JLP feels is sustainable for the area, which the Scoping Report touches upon on p3. As you will see, we have previously sought clarification of the status of such aspirations and this issue may well have contributed to the Council's position.	This has been clarified in this Environmental Report.
It would be useful to have clarity on the basis for concluding that an SEA is required explained in the Scoping Report, especially as it will likely influence the focus of the SEA process and the key environmental considerations it aims to address.	

Consultation response	How the response was considered and addressed
<p>Otherwise, we note that no historic environment or heritage issues – ie concerns or opportunities for enhancement rather than “sustainability issues” - are identified within that section of the Scoping Report (p19-). Is that because there are none or that evidence gathering which might identify same has not taken place? Confirmation either way would be useful.</p>	<p>This has been confirmed- there are no particular significant issues identified. However the Neighbourhood Plan area has a number of features and areas of historic environment interest (including some that are designated), which have been highlighted in the baseline information and considered through the SEA process.</p>
<p>As you know from previous correspondence between us on neighbourhood plan SEAs, Historic England has published guidance on SEAs, Setting and Site Allocations, references to which are below. https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/ https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<p>Comment noted, the guidance has been reviewed.</p>
Environment Agency	
<p>No comments received.</p>	<p>N/A</p>

3.2 Key sustainability issues

Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SEA. These issues are as follows, presented by seven environmental themes:

3.2.1 Biodiversity

- South Milton Ley Site of Special Scientific Interest (SSSI) is the only national biodiversity designation within the Neighbourhood Plan area. There are no European designated biodiversity sites.
- The whole of the Neighbourhood Plan area is located within an Impact Risk Zone (IRZ) for the South Milton Ley SSSI as well as IRZs for two further SSSIs located outside of the plan area.
- There are a number of UK BAP priority habitats present in the Neighbourhood Plan area. This includes within the area known as the South Huish meadowlands.
- There is a need to prevent the loss, fragmentation and deterioration of the distinctive ecological character of the parish.

3.2.2 Climate Change

- Coastal and surface water flood risk is an issue for some parts of the Neighbourhood Plan area.
- The culvert by the Village Hall has limited capacity, and during severe rainstorms can become overrun, causing water to overflow the highway before finding its way back into the watercourse immediately downstream.
- South Hams has reported consistently higher greenhouse gas emissions per capita than both the South West and England between 2005 and 2012. However, the average reduction in emission per capita between 2005 and 2012 in the South Hams was higher than its regional and national counterparts.
- There is a need to increase the Neighbourhood Plan area's resilience to the effects of climate change by supporting and encouraging adaptation strategies.

3.2.3 Landscape and Historic Environment

- The whole of the Neighbourhood Plan area sits within the South Devon Area of Outstanding Natural Beauty (AONB).
- The Neighbourhood Plan area forms part of National Character Area (NCA) 151, exhibiting most of the key characteristics for which the NCA is defined.
- There is a high density of historic assets within the Neighbourhood Plan area, with 35 listed buildings. One of these is Grade I listed. The South Milton Conservation Area covers two parts of South Milton village.
- Over half of the Neighbourhood Plan area is located within the South Devon Heritage Coast, which is afforded planning consideration as part of the National Planning Policy Framework (NPPF).

3.2.4 Land, Soil and Water Resources

- Land quality is good within the Neighbourhood Plan area, with no significant pollution incidents recorded or historic landfill sites present.
- In relation to the Agricultural Land Classification assessment, the Neighbourhood Plan area is mostly covered by Grade 3 agricultural land, with some areas of higher and lower quality.
- There is a sewage treatment works located within the Neighbourhood Plan area, just north of the South Milton Ley SSSI.
- The watercourses within the Neighbourhood Plan area are made up of streams, drainage channels and the reed-bed swamp area associated with the South Milton Ley.
- There are no Groundwater Source Protection Zones (SPZ) within the Neighbourhood Plan area, however there is a Groundwater Nitrate Vulnerable Zone (NVZ) covering the northern part of the plan area.

3.2.5 Population and Community

- There is an ageing population within the Neighbourhood Plan area, with a higher proportion of residents within the 60+ age group than the average for the South Hams, the South West and England.
- Recent population decreases within the Neighbourhood Plan area is in contrast with district, regional and national trends.
- Household deprivation within the Neighbourhood Plan area aligns with the South Hams average, and is less than the regional and national average.

- Residents within the Neighbourhood Plan area have relatively high levels of education in comparison with local, regional and national averages.
- The Neighbourhood Plan area performs excellently in terms of the outdoor quality of life, with sufficient access to fresh air and green spaces.

3.2.6 Health and Wellbeing

- The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health'. The percentage of residents that report this is higher relative to South Hams, South West and England averages.
- Comparatively, a lower than average percentage of residents (2.3%) within the Neighbourhood Plan area report 'bad health' or 'very bad health' which is lower than the local, regional and national average.
- The percentage of residents within the Neighbourhood Plan area that report their activities are limited to some degree broadly align with local, regional and national averages.
- However the percentage of residents within the Neighbourhood Plan area that report 'activities limited a lot' is lower than the local, regional and national average.
- Given the rural setting of the parish, residents within the Neighbourhood Plan area have relatively good access to healthcare services, with South Hams/Kingsbridge Community Hospital a ten minute drive away.
- An ageing population and any future population increases are likely to put additional pressure on these healthcare services.

3.2.7 Transportation

- There is no railway link and limited access to bus services within the Neighbourhood Plan area;
- The road network within the Neighbourhood Plan area comprises predominantly narrow single lane roads. The A381 provides the main access to the Neighbourhood Plan area.
- National Cycle Route 28 passes through the Neighbourhood Plan area.
- A network of footpaths and bridleways criss-cross the Neighbourhood Plan area, and the South West Coast Path follows the coast.
- Residents within the Neighbourhood Plan area predominantly drive to work, with a relatively high percentage of residents working from home or no in active employment.

3.3 SEA Framework

These issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the SMNP is presented below.

Table 3.2: SEA Framework for the South Milton Neighbourhood Plan

SEA Objective	Assessment questions
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support continued improvements to the status of the nationally designated South Milton Ley SSSI? • Protect and enhance the area known as the South Huish meadowlands? • Support the status of the locally designated sites of interest? • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climatic factors	
Promote climate change mitigation in the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Limit the increase in the carbon footprint of the plan area from population growth? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Increase the number of new developments meeting 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	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that no development takes place in areas at higher risk of flooding, taking into account the likely 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 plan area? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?

SEA Objective	Assessment questions
Landscape and Historic Environment	
Protect, maintain and enhance South Milton Parish's cultural heritage resource, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance the South Milton Conservation Area? • Conserve and enhance local diversity and distinctiveness? • Support access to, interpretation and understanding of the historic environment?
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 landscape and villagescape character? • Conserve and enhance the South Milton Conservation Area? • Support the integrity of the South Devon AONB and Heritage Coast designation?
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 Neighbourhood Plan area may comprise Grade 2 and 3a agricultural land?
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 groundwater resources
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"> • Promote the development of a range of high quality, accessible community facilities? • 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

SEA Objective	Assessment questions
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>specialist services for disabled and older people?</p> <ul style="list-style-type: none"> • Support the provision of land for allotments and cemeteries? • Facilitate home working and running a business from home?
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 of residents in South Milton.	<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? • Align to the key priority areas outlined in the Joint Strategic Needs Assessment? • 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?
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"> • Reduce the need to travel through sustainable patterns of land use and development? • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • 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 to this point?

4.1 Introduction

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.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the SMNP has been informed by an assessment of alternative locations for non-strategic scale development in the Neighbourhood Plan area.

4.2 Overview of plan making / SEA work undertaken since 2015

Plan-making for the SMNP has been underway since 2015. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan.

A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included a range of exhibitions, public meetings and questions and answer sessions as well as workshops. Regulation 14 consultation was also undertaken late in 2016.

The following sections discuss the evolution of the SMNP in association with the SEA process.

4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the SMNP. The SEA Regulations⁶ 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*'.

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 proposed development. Specifically, this chapter explains how the SMNP's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area

As discussed in section 2.1, the Neighbourhood Plan has been prepared in the conjunction with the provisions of the emerging South Hams Local Plan, as presented in the submission version of the Plymouth and South West Devon Joint Local Plan (JLP), which will supersede the South Hams Local Development Framework and cover the time period up until the year 2034.

The submission version of the JLP does not identify sites for development within South Milton, but takes an approach which aims to enable development to come forward in the village. As such the latest version of the JLP indicates that the South Milton Neighbourhood Plan area has the potential to accommodate around ten extra dwellings over the plan period, in order to limit the potential impact on the sensitive South Devon AONB landscape.

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

In light of this, the Neighbourhood Plan seeks to allocate housing in the Neighbourhood Plan area, with a view to supporting the vitality of the Neighbourhood Plan area and promoting growth which meets local housing needs.

To help shape decision making on the location of housing in the Neighbourhood Plan area, the Neighbourhood Plan Steering Group sought to explore different options for housing.

A first consideration was where, in broad terms to facilitate new housing provision in the area. Two main areas of the Neighbourhood Plan area are currently developed. South Milton village and Sutton comprise the main settlement in the Neighbourhood Plan area. An additional built up area is the coastal part of the parish close to South Milton Sands.

To support decision-making on these elements, the SEA process undertook an appraisal of two different alternative approaches linked to the broad location of development in the Neighbourhood Plan area. These were as follows:

- **Option 1:** Enable new housing provision within the coastal part of the parish.
- **Option 2:** Focus new housing provision in the areas covered by South Milton village and Sutton.

These two options were subjected to assessment.

Table 4.1 presents the findings of the appraisal of Option 1 and Option 2 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the two options in relation to each theme considered.

Table 4.1: Appraisal findings: reasonable alternatives

Option 1: Enable new housing provision within the coastal part of the parish.

Option 2: Focus new housing provision in the areas covered by South Milton village and Sutton.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and geodiversity	<p>The key biodiversity designation in the Neighbourhood Plan area is the South Milton Ley SSSI which is designated for containing priority habitats and species listed in Schedule 1 of the Wildlife and Countryside Act 1981. Located in the south west of the parish, adjoining the coast, the whole of this part of the parish is within an IRZ for 'any residential development of 10 or more houses outside existing settlements/urban areas', with some locations being within the IRZ for 'all planning applications'. South Milton village lies within the SSSI's IRZ for 'residential development of 100 units or more' and 'rural residential development of 50 or more houses outside existing settlement/urban area'. As such Option 1, which focuses a greater degree of development in the more sensitive parts of the parish in relation to the SSSI, has increased potential for effects on this nationally designated site.</p> <p>The relative merits of Option 2 compared to Option 1 however largely depend on the provision of green infrastructure to accompany new development areas and enhance ecological networks and the retention and incorporation of biodiversity features.</p>	2	1

Option 1: Enable new housing provision within the coastal part of the parish.

Option 2: Focus new housing provision in the areas covered by South Milton village and Sutton.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Climate change	<p>In terms of greenhouse gas emissions, road transport is the significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element.</p> <p>In this context, Option 2 is likely to encourage a distribution strategy which promotes development at locations in closer proximity to the existing services and facilities of the main settlements in the Neighbourhood Plan area. This will support modal shift through encouraging new development in locations with closer proximity to the services, facilities and amenities present in South Milton village. However given the limited range of services and facilities in the village, and the reliance of residents on nearby settlements such as Kingsbridge, the difference between the options with regards to emissions is likely to be minimal.</p> <p>In terms of climate change adaptation, the extent to which the options promote climate change adaptation depends on the specific location, design, layout and scale of development, and the incorporation of features which support climate resilience.</p>	1=	1=
Historic environment and landscape	<p>In relation to historic environment constraints, South Milton village and Sutton have the largest concentration of features and areas of historic interest in the Neighbourhood Plan area. This includes the two segments of the South Milton Conservation Area and over 20 listed buildings. In contrast the coastal area of the Neighbourhood Plan area has no conservation areas and only one listed building. As such Options 2 has less potential to have impacts on the setting of sites designated for their historic interest.</p> <p>Both areas covered by Option 1 and 2 are within the South Devon AONB. As such any development within these areas has the potential to impact on landscape character within the AONB if inappropriately located or designed. However, it is possible that Option 2 will help limit development in the more sensitive coastal parts of the Neighbourhood Plan area. Option 2 will also limit development in the parts of the Neighbourhood Plan area within the Heritage Coast.</p>	?	?
Land, soil and water resources	<p>Given the coverage of Grade 3 agricultural land in the parish, both options have the potential to lead to the loss of the best and most versatile agricultural land. Whilst the area of Grade 2 agricultural land in the parish is within the area covered by Option 1, given its location adjacent to South Milton Ley, this area is unlikely to be developed due to the provisions of the SSSI designation.</p>	?	?

Option 1: Enable new housing provision within the coastal part of the parish.

Option 2: Focus new housing provision in the areas covered by South Milton village and Sutton.

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Population and community	<p>Option 2 will facilitate development in closer proximity to South Milton village, in good proximity to the settlement's (limited) facilities. The option will also do more to support the renewal and vitality of the village.</p> <p>Option 1 will however facilitate a distribution strategy which promotes development in the coastal areas of the parish. This area is readily accessible to the wider range of services and facilities available in Thurlestone, including the post office/shop, pub and school.</p> <p>Both options will help deliver new housing in the Neighbourhood Plan area, helping to meet local needs.</p>	1	2
Health and Wellbeing	<p>Both options will support the location of housing provision with good access to the public rights of way network and the range of green and blue infrastructure assets present locally.</p> <p>Both options will locate housing which will be reliant on Kingsbridge and Salcombe for health services.</p>	1	1
Transport	<p>Option 2 will locate housing in South Milton village, which is slightly more accessible to the range of services and facilities available in Kingsbridge and Salcombe than the areas where housing will be located through Option 1.</p>	2	1

Development on previously developed land vs greenfield development

To further support the intention of the Neighbourhood Plan to shape new development within the Neighbourhood Plan area, two further potential options were considered, namely whether to 1) focus development on existing previously developed 'brownfield' sites in South Milton Parish or 2) widen the scope of the Neighbourhood Plan to consider development on previously undeveloped 'greenfield' sites in the Neighbourhood Plan area.

To support decision making on this element of the SMNP, two options were considered as reasonable alternatives through the SEA process.

The two options were as follows:

- Option 1: Facilitate the development of greenfield sites in the Neighbourhood Plan area; and
- Option 2: Focus development on previously developed sites in the Neighbourhood Plan area.

Table 4.2 presents the findings of the appraisal of Option 1 and Option 2 outlined above. To support the assessment findings, the options have been ranked in terms of their sustainability performance against the relevant theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the two options in relation to each theme considered.

Table 4.2: Appraisal findings: options for broad locations of development**Option 1: Facilitate the development of greenfield sites****Option 2: Focus development on previously developed sites**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Biodiversity and geodiversity	<p>Potential effects on biodiversity have the potential to take place on both previously developed and greenfield land. Whilst greenfield development has the potential to lead to the loss of key landscape features of biodiversity value and impact on ecological corridors, previously developed land can support a rich biological diversity. In this context previously developed land can provide habitat for UKBAP Priority Species and contribute to wider ecological networks, as well as the provision of ecosystem services such as pollination.</p> <p>All allocations have the potential to have impacts on biodiversity assets if located inappropriately and have poor design and layout. Likewise all allocations have the potential to promote net gains in biodiversity value. In this context, for all sites, potential effects on biodiversity depend on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.</p>	1	1
Climate change	<p>In terms of greenhouse gas emissions, road transport is a significant contributor to emissions in the area. The extent to which the two options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element. In this context, Option 2, through promoting the development of previously developed land has increased potential to promote development in locations in the village which are more integrated with the existing built up area of the Neighbourhood Plan area. This has the potential to allow at some locations easier access to services and facilities by enhanced accessed. However, it should be noted though that given the limited range of services and facilities in the parish, private car use will continue to overwhelmingly be the dominant form of transport in the Neighbourhood Plan area, so impacts will not be significant.</p> <p>The option also does not preclude the development of brownfield land in the countryside. In this respect, development at these locations has the potential to be less accessible and require an increased level of car use.</p> <p>In terms of climate change adaptation, the redevelopment of previously developed land provides opportunities for enhancing the resilience of brownfield sites and surrounding area to the effects of climate change. This includes through green infrastructure enhancements and design and layout which helps regulate the effects of extreme weather events in the village, including through regulating surface water run-off. In this context, whilst the direct provision of green infrastructure improvements to accompany new development areas should be achievable through both options, including through mechanisms such as the community infrastructure levy, the redevelopment of brownfield land increases scope for direct improvements to climate change resilience.</p>	2	1

Option 1: Facilitate the development of greenfield sites**Option 2: Focus development on previously developed sites**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Landscape and historic environment	<p>Option 1, through facilitating greenfield development in the Neighbourhood Plan area, increases the scope for impacts on landscape character, including from visual impact and impacts on noise quality. The potential significance of such effects is increased due to the location of greenfield sites within and visible from the South Devon AONB. As such greenfield development has increased potential to have impacts on the special qualities of the AONB.</p> <p>Whilst Option 2 has the potential to have direct impacts on historic environment assets located on brownfield sites, high quality development sensitive to the historic environment resource has the potential to support enhancements to villagescape character and the rejuvenation of disused or underutilised historic environment assets. Given the significant opportunities for supporting the reuse and rejuvenation of existing heritage assets in parts of the village and in areas surrounding the village such as disused farm buildings, this will support the Neighbourhood Plan area's historic environment resource, if high quality design and layout is incorporated within new provision. Similarly Option 2 provides opportunities for enhancing local character and distinctiveness if high quality design is incorporated within new provision. Option 2 therefore increases opportunities to rejuvenate existing underutilised heritage assets whilst protecting landscape character, and offering opportunities to enhance visual amenity and the setting of the historic environment.</p>	2	1
Land, soil and water resources	<p>Option 1 will lead to the loss of greenfield land in the Neighbourhood Plan area. The option also has increased potential to lead to the loss of areas of the best and most versatile agricultural land (incorporating, potentially, Grade 2 and 3a land present in the Neighbourhood Plan area).</p> <p>Option 2 has increased potential to support the efficient use of land through the reuse of existing structures and rejuvenating previously developed land.</p> <p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However, given the potential for development on previously developed land to reduce land contamination, Option 2 has the potential to lead to medium and long term improvements to water quality.</p>	2	1

Option 1: Facilitate the development of greenfield sites**Option 2: Focus development on previously developed sites**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Population and community	<p>In terms of affordable housing, such provision may be easier to deliver through the larger allocations which potentially there may be more scope to deliver through Option 1. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at larger sites may help enable the securing of additional contributions to site specific mitigation through Section 106 planning agreements (it should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable).</p> <p>Alongside, the small sites affordable housing contributions policy was introduced by the UK Government in November 2014 to help boost housing delivery and incentivise brownfield development. It introduced a national threshold of ten units or fewer (and a maximum combined gross floor space of no more than 1,000 square metres) beneath which affordable housing contributions should not be sought. Within AONBs, the exemptions would apply only to developments not exceeding 5 new homes; developments of 6 to 10 homes could pay a commuted sum, either at or after completion of the development. The policy was introduced to address the burden of developer contributions on small scale developers, custom and self-builders. In this context, given the likely size of allocations taken forward through the Neighbourhood Plan, both options provide opportunity for delivering affordable housing in the village, and helping to meet local housing needs.</p> <p>In terms of the provision of services and facilities, the delivery of CIL monies and similar mechanisms are likely to be more achievable through the allocations facilitated through Option 1.</p>	1	2
Health and wellbeing	<p>The delivery of housing provision through larger scale allocations potentially enabled by Option 1 has the potential to concentrate effects on road safety and noise quality from increased traffic flows at certain locations. This may have effects on the health and wellbeing of residents. Effects however depend on the location of new development areas and the integration of elements such as sustainable transport linkages and green infrastructure provision.</p> <p>Option 2 has the potential for supporting health and wellbeing through improvements to the quality of the built environment in certain locations in South Milton.</p>	2	1

Option 1: Facilitate the development of greenfield sites**Option 2: Focus development on previously developed sites**

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		Opt 1	Opt 2
Transportation	<p>Option 2, through promoting development on previously developed land, has increased potential to facilitate the development of new housing at locations which are more integrated within the village. This has the potential to allow at some locations easier access village centre services and facilities by sustainable modes of transport such as walking and cycling. The option does not however preclude brownfield development in less accessible locations in the countryside.</p> <p>However, it should be noted that given the limited range of services and facilities in the parish, private car use will continue to overwhelmingly be the dominant form of transport in the Neighbourhood Plan area, so impacts will not be significant.</p>	2	1

4.3.1 Appraisal 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 further 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:

Option A: Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in the Neighbourhood Plan area 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.

As for the previous two sets of options, these two broad options were appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other). They were again 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 4.3**.

Table 4.3: 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 the South Milton Neighbourhood Plan area 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 two South Milton Ley SSSI present in south of the Neighbourhood Area. However, these effects are unlikely to be significant given the current management of the sites.</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
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 emission 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

Option A: Introduce a policy through the Neighbourhood Plan which seeks to restrain second home ownership and holiday rentals in the South Milton Neighbourhood Plan area 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
Population and community	<p>Recent surveys have highlighted that approximately 31% of the housing stock in the Neighbourhood Plan area had no full-time resident in 2015, an increase from 23% in 2001. In this context, 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.</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	<p>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.</p>	1	2
Transportation	<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 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

4.4 Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

The Neighbourhood Plan has been prepared in conjunction with the provisions of the emerging Plymouth and South West Devon Joint Local Plan.

To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.2, the Submission version of the SMNP puts forward 12 policies to guide development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering.

The Submission version of the Neighbourhood Plan allocates one brownfield site in South Milton village for 18 homes. This was chosen for allocation following a consideration of land availability in the parish, and consideration of the findings of the assessment of reasonable alternatives presented above.

In summer 2017 an early version of the proposed Neighbourhood Plan policies was assessed by the SEA team. At this stage, a number of recommendations were made, with a view to enhancing the sustainability performance of the plan. These recommendations can be summarised as follows:

- Additional provision should be included in plan policies to support the protection and enhancement of the South Milton SSSI.
- There is the potential to include additional policy wording to more strongly emphasise the need to enhance ecological linkages and networks in the Neighbourhood Plan area.
- There is the potential to include additional policy wording to more directly recognise the 'Special Qualities' of the South Devon AONB and the need for new development proposals to reflect the provisions of the South Devon AONB Management Plan.
- Policies should seek to deliver green infrastructure enhancements in conjunction with existing green infrastructure work being carried out by South Hams District Council, Devon County Council, Natural England and other organisations, including in relation to the South Hams Green Infrastructure Framework.

The SMNP policies were then updated to reflect these comments. The latest policies presented in the Submission version of the Neighbourhood Plan are as follows:

Table 4.4: South Milton Neighbourhood Plan policies**Policies**

E&CM 1	Landscape Policy
E&CM 2	Coastal Environment Policy
E&CM 3	Policy
E&CM 4	Biodiversity Policy
E&CM 5	Conservation Area Policy
E&CM 6	Flood and Pollution Control Policy
E&CM 7	Renewable Energy Policy
H1	Land allocation policy for housing
H2	Land allocation policy for Village Hall car parking and footpath/cycleway
H3	Land allocation policy for a children's playspace at the rear of the Village Hall
H4	General Housing Policy
EMP 1	Employment Policy

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

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

5.1 Introduction

The aim of this chapter is to present appraisal findings in relation to the Submission version of the SMNP. This chapter is structured as follows:

Sections 5.3 to 5.9 present an appraisal of the current Submission version of the SMNP under the seven SEA theme headings; and

Section 5.10 subsequently discusses overall conclusions at this current stage.

5.2 Approach to the appraisal

The appraisal is structured under the seven SEA themes.

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.⁷ 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.

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.

5.3 Biodiversity and geodiversity

The key designated site of biodiversity importance in the Neighbourhood Plan area is the South Milton Ley SSSI. In terms of the proposed allocation taken forward through the SMNP, which allocates in the region of 10-20 dwellings at The Dairy at Milton Lane, this is unlikely to have impacts on the integrity of the SSSI. This is given that the allocation is not located within an SSSI Impact Risk Zone for the type of development proposed (the IRZ covering the location is for "*any residential development of 100 or more houses outside existing settlements/urban areas*"). Alongside, the policy for the allocation, H1 (Land Allocation Policy for Housing), seeks to limit potential effects on designated sites in association with the provisions of the JLP and integrate appropriate landscaping with the new development area. More broadly in terms of the SSSI, Policy E&CM2 (Coastal Environment Policy) seeks to restrict new development within coastal parts of the Neighbourhood Plan area and E&CM4 (Biodiversity Policy) specifically seeks to ensure that development proposals support recent improvements in the condition of the South Milton Reserve SSSI. As such, it is likely that preferred spatial strategy for the SMNP will not undermine ongoing improvements to the condition of the SSSI, which was evaluated by Natural England in 2013 as being in an 'unfavourable recovering' condition.

The proposed allocation at The Dairy is otherwise not located within an area sensitive for biodiversity, and does not contain features of importance for the parish's ecological networks. It is also not located close to locally designed sites such as County Wildlife Sites, and development on the site is not likely to lead to the loss of or impact on Biodiversity Action Plan Priority Habitats.

More broadly, the current version of the South Milton Neighbourhood Plan sets out a number of provisions to help limit potential effects of new development on features and areas of biodiversity interest in the Neighbourhood Plan area, and support enhancements. A key policy in this regard is policy E&CM4 (Biodiversity Policy). This seeks to support the parish's ecological networks, including

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

through the provision of new biodiversity habitats and an enhancement of linkages between existing habitats. Policy E&CM1 (Landscape Policy) will further support ecological networks in the Neighbourhood Plan area through seeking to preclude the loss of Devon lanes, banks or green lanes from new development and precluding impacts on these key ecological linkages.

In this context the policies offer a proactive approach to protecting and enhancing habitats and species and ecological networks in the Neighbourhood Plan area, supporting Local Plan policies.

5.4 Climate change

In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. Whilst it is recognised that there is little scope to directly enhance public transport networks through the Neighbourhood Plan, the SMNP seeks to improve the frequency of bus services to and from the village through the projects it supports in the annexe of the Neighbourhood Plan. Alongside, the SMNP seeks to support enhancements and access to the Public Rights of Way Network in the area. This will support lower carbon modes of transport such as walking and cycling. However given the location of existing key services and facilities (including Kingsbridge and Salcombe), this is likely to have a negligible effect on traffic flows and emissions.

In terms of the energy efficiency of new development, the SMNP seeks to ensure that development areas incorporate energy efficiency measures. Whilst in this context the SMNP does not seek to go beyond existing Local Plan provisions for encouraging energy efficiency, with regard to residential developments the scope to set standards for residential building performance was radically curtailed by the Government's Housing Standards Review. The Ministerial Statement published on 25th March 2015 outlined the Government's new national planning policy on the setting of technical standards for new dwellings and Local Plan making. The Code for Sustainable Homes was formally withdrawn so targets against this should no longer be set in policy, and local authorities were no longer able to require higher standards as a planning condition for new approvals. The Deregulation Act also brought in a Clause which amended the Planning and Energy Act 2008 to prevent local authorities from requiring higher levels of energy efficiency than existing Building Regulations. As such the lack of such targets within the Neighbourhood Plan sits within the context of national policy on this topic.

In terms of renewable energy provision, the SMNP does not seek to encourage additional wind energy provision within the Neighbourhood Plan area. However, the SMNP does not seek to restrict other renewable energy provision in the Neighbourhood Plan area, including small scale domestic provision.

In relation to climate change adaptation, the provisions of the NPPF, the Shoreline Management Plan, the Joint Local Plan/SFRA and the Local Flood Risk Management Strategy will help address potential flood risk issues in the Neighbourhood Plan area. However, E&CM6 (Flood and Pollution Control Policy) will help support the resilience of the Neighbourhood Plan area to extreme rainfall events through seeking to regulate surface water run-off and reduce impacts from new development on key 'pinchpoints' in the village with regards to surface water flood risk. This is an important inclusion given that part of the proposed site for allocation is within a surface water flood zone.

The policies supporting biodiversity in the Neighbourhood Plan area (section 5.3) will help increase the resilience of ecological networks to the effects of climate change through making provision for improvements to habitats and enhancing such networks.

5.5 Landscape and historic environment

The Neighbourhood Plan area has a valued landscape and a rich historic environment. In this context the whole of the Neighbourhood Plan area is within the South Devon AONB, coastal areas have been designated as a Heritage Coast, and there are significant clusters of historic environment assets present locally, as reflected by the designation of a conservation area covering two parts of South Milton. In this context, a central focus of the policies proposed for the SMNP is on protecting landscape and villagescape character, protecting and enhancing the quality of the public realm,

supporting local distinctiveness and supporting the conservation and enhancement of the historic environment.

Villagescape and landscape quality and the integrity of the historic environment will be supported by the policies which promote high quality design, layout and the provision of features and areas which promote the quality of the public realm. In this context H4 (General Housing Policy) seeks to ensure that new development "...complements the character, appearance and strong sense of place of the parish" is well designed and uses traditional materials, and "...respects existing entry points to the village and does not adversely affect protected views to and from the village, particularly on the seaward side." and H1 (Land Allocation for Housing Policy) sets out a range of provisions for protecting and enhancing the quality of the public realm and local distinctiveness through the new housing allocation at The Dairy.

E&CM1 (Landscape Policy) sets out a number of provisions for protecting key views and vistas in the Neighbourhood Plan area. This includes along Links Road between Primrose Cottage and Kerse Lane, between Collacott and the coast along Horswell Lane, and above Three Corners along Kerse Lane. This will be supported by E&CM2 (Coastal Environment Policy), which seeks to 1) preclude development within the part of the Neighbourhood Plan area within the Heritage Coast which requires additional car parking and 2) protect views from the South West Coast Path.

Landscape character will also be supported by E&CM7 (Renewable Energy Policy), which does not allocate new wind turbines in the area, and E&CM1, which seeks to limit light pollution in the area and retain and protect key landscape features present locally, including Devon lanes, banks and green lanes. This will be further supported by EMP1 (Employment Policy), which seeks to limit impacts on landscape character from new employment provision.

In relation to the historic environment, the Neighbourhood Plan's focus on protecting landscape character and local distinctiveness will support the setting of the historic environment. In this context the Neighbourhood Plan has a close focus on supporting the integrity of the conservation area designated within the Neighbourhood Plan area. This includes through E&CM5 (Conservation Area Policy), which recognises the importance of the South Milton Conservation Area by seeking to ensure development proposals are required to preserve or enhance the character of the village and facilitate extensions to the conservation area in the future. This will be supported by the projects for the Neighbourhood Plan, which seeks to facilitate the preparation of a Conservation Area Management Plan for the conservation areas in the parish.

Given its location, the allocation at The Dairy is also not likely to impact on the setting of the conservation area in the Neighbourhood Plan area, or listed buildings. It also provides significant opportunities for the enhancement of the villagescape in the area and the quality of the public realm.

In the context of the above, the current version of the SMNP provides a robust basis for the conservation and enhancement of landscape and townscape character in the Neighbourhood Plan area and the conservation and enhancement of historic environment assets and their settings.

5.6 Land, soil and water resources

The Neighbourhood Plan will support the efficient use of land. In this context the development strategy for the SMNP seeks to focus new development on previously developed land, helping to limit the loss of agricultural land in the Neighbourhood Plan area. Soils resources will be further supported by Policy E&CM3 (Farmland Policy), which states that "*Proposals that involve the loss of Grade 1, Grade 2 or Grade 3a land will not be supported without overriding justification, including demonstration that the development is necessary and could not be located on land of a lesser grade*".

The efficient use of land will also be supported through H4 (General Housing Policy) which seeks to promote new development which "...results in the permanent occupation of additional housing through the conversion of suitable disused or redundant buildings."

E&CM6 (Flood and Pollution Control Policy) will help support the regulation of surface water run-off and reduce impacts from new development on key 'pinchpoints' in the village with regards to surface water flood risk. This will support water quality. The policy also seeks to control erosion during construction of new development areas through preventing silt being washed off the site and into drains and watercourses.

More broadly, the policies supporting habitats and species, as well as green space will also enhance the quality of land and water resources through promoting the ability of natural processes to support soil and water quality.

5.7 Population and community

The current version of the SMNP allocates one site for housing, with a provision totalling in the region of 18 dwellings. As this is anticipated to exceed the requirements of the Plymouth and South West Devon Joint Local Plan (10 dwellings), it is assumed that this growth quantum will meet the numbers associated with objectively assessed housing needs arising locally.

Recent surveys have highlighted that approximately 31% of the housing stock in the Neighbourhood Plan area had no full-time resident in 2015, an increase from 23% in 2001. In this context the policies which seek to restrict the use of new homes as second homes or holiday lets, including H1 (Land Allocation for Housing Policy) and H4 (General Housing Policy), will support the availability and affordability of new housing, improving accessibility to the housing stock for local people. This will be further supported by H1 (Land Allocation for Housing Policy) which sets out the provisions for the proposed allocation at The Dairy. Provisions put forward through this policy include the delivery of a mix of types of housing, including smaller and larger housing, and 20% of homes being designed for disabled access. The policy also seeks to ensure approximately a third of units are affordable and rented to people with local connections by a housing association using Devon Home Choice criteria, and up to a third of plots shall be made available to those seeking to self-build their own homes.

Outside of housing allocated at The Dairy, H4 (General Housing Policy) sets out a range of further provisions for the delivery of housing which meets local needs. This includes through: seeking to ensure that new housing provision provides a mix of homes, taking into account objectively identified housing needs; seeking to ensure affordable housing will remain affordable "*...for local people in perpetuity*"; and provides sheltered housing and other provisions for older people in the parish. Otherwise, in terms of the quality of housing and neighbourhoods, the Neighbourhood Plan has a strong focus on the high quality design and layout of new housing and on protecting and enhancing the quality of the public realm. This will support the quality of life of residents in the Neighbourhood Plan area.

The SMNP supports a range of provisions which will enhance accessibility to community facilities and support the quality of life of residents. This includes the provision of new cycle and pedestrian links and car parking provision through H2 (Land Allocation Policy for Village Hall Car Parking and Footpath/Cycleway) and a new children's playspace through H3 (Land Allocation Policy for a Children's Playspace). More broadly, Policy H4 also seeks to deliver new community facilities and open space in the Neighbourhood Plan area. This will be further supported by the range of Local Projects put forward in Appendix 2 of the Neighbourhood Plan, which will facilitate the delivery of a range of new and enhanced community provision in the parish.

The economic vitality of the area will be supported by EMP1 (Employment Policy). This supports the diversification of the economy through seeking to support small businesses, including through encouraging the provision of live-work units and home working. Homeworking and running a business from home will also be promoted by the projects supported by the SMNP, including the project which seeks to enhance broadband infrastructure in the Neighbourhood Plan area.

Promoting a key element of the local economy, E&CM3 (Farmland Policy) sets out a number of provisions which will support the agricultural economy. In terms of the visitor economy, the Neighbourhood Plan's close focus on protecting and enhancing the landscape and villagescape

character and the built and natural environment will support tourism. This will be further supported by the enhancements to the public rights of way network promoted through the Neighbourhood Plan.

5.8 Health and wellbeing

The health and wellbeing of residents will be supported by Policy H4 (General Housing Policy) which supports a high quality public realm, local distinctiveness and landscape/townscape character. This is further supported through the site allocation policy H1 (Land Allocation Policy for Housing), and H3 (Land Allocation Policy for a Children's Playspace at the Rear of the Village Hall). Both policies require that the layout and design of development should include appropriate tree planting and landscaping, complementing the character and strong sense of place of the parish. In this context maintaining and enhancing the attractiveness of the Neighbourhood Plan area will positively affect residents' quality of life, contributing to the satisfaction of residents with their neighbourhood as a place to live.

It is recognised that level of health and wellbeing in the parish is generally high, but that there is scope to extend and develop leisure opportunities, particularly those focused on the village hall. This is promoted through Policy H1 (Land Allocation Policy for Housing) which includes the provision of suitable play equipment for children in the age range 3-10, and the plan's focus on new community facilities, as discussed in section 5.7 above. This will have a positive effect on community cohesion, increasing resident interaction, and positively affecting mental health.

A focus of a number of the Neighbourhood Plan's policies is protecting and enhancing the Neighbourhood Plan area's high quality natural environment. Policy E&CM2 (Coastal Environment Policy) seeks to conserve and enhance the special qualities of the coastline, recognising the value of its unspoilt character, appearance and tranquillity. The coastline is a key feature for the Neighbourhood Plan area, providing access to open space and recreation, promoting to levels of physical activity and overall health.

An extensive network of footpaths and green lanes provide green corridors linking most parts of the parish, which are key components of the green infrastructure network for the area. Policy E&CM1 (Landscape Policy) seeks to retain Devon Lane, Banks, and Green Lanes in their current form, ensuring residents and visitors have continued access to these valued features. A section of the South West Coast Path also runs through the parish and is utilised by residents and visitors, providing access to the beach; an attractive option for walkers with dogs. E&CM2 (Coastal Environment Policy) requires that the landscape viewed from the coast path will be conserved, maintaining and enhancing its special qualities, and avoiding degradation. Upholding the parish's green lanes, footpaths and idyllic views provides for recreation and relaxation, supporting health and wellbeing.

National Cycle Route No 28 runs through the village and along Horswell Lane, further supporting active lifestyles and healthy travel. Considering the nature of the road network in and around the village, utilisation of the cycle network is encouraged by the Neighbourhood Plan, and is a focus for a number of policies. The Dairy site (Policy H1: Land Allocation Policy for Housing) will provide an opportunity to divert National Cycle Route 28 off the narrow lane and provide an off-road route from the centre of the village to the coast. This is supported alongside the provision of a new footpath, which will provide part of a safe walking route through the countryside to the village centre. Further to this, Policy H2 (Land Allocation Policy for Village Hall Car Parking and Footpath/ Cycleway) includes provision for a dedicated footpath/cycle way to link The Dairy site and Milton Lane to the Village Hall Car Park. These improvements are expected to enhance pedestrian/cycle movement through the village, particularly where access through the village is currently seen to be unsafe. This may result in less dependency on the car for shorter journeys, encouraging residents to travel by foot/bike to village amenities, and to access bus links available in the village.

5.9 Transportation

In terms of accessibility via sustainable transport modes, The Dairy site (Policy H1: Land Allocation Policy for Housing) is located close to the centre of the village and village amenities, with sufficient access to local bus routes. There is also a PRoW crossing the site.

As discussed under Section 5.8, Policy H1 (Land Allocation Policy for Housing) will also be supported by the provision of a footpath/cycle way linking The Dairy site with the village hall. This will facilitate enhanced and safe pedestrian access to and from key parts of the village, creating new and improved links in the village's active travel network. This is expected to encourage the uptake of sustainable travel, potentially limiting the growth in traffic in the SMNP area.

The road network is a substantial constraint for the area, with congestion seen along Links Road and Horswell Lane during peak periods. Recognising these issues, Policy EMP1 (Employment Policy) requires that small business development does not generate additional traffic.

Policy E&CM2 (Coastal Environment Policy) discusses the issue of parking at South Milton Sands and Links Court, reiterating that existing car parks, including the overflow, will be maintained. The provision of new car parking is also included within Policy H1 (Land Allocation Policy for Housing). Car parking is highlighted as key issue for residents in the Neighbourhood Plan area. Due to current access issues to services, facilities and amenities in the village, both for residents and visitors, delivery of a new car park under Policy H1 will likely improve access and contribute to reduced congestion in the village centre through limiting the need for on-street parking. This is expected to lead to a range of positive effects in the village given the road network within the Neighbourhood Plan area comprising predominantly narrow single lane roads.

A number of the Neighbourhood Plan 'Local Projects' presented in Appendix 2 will also support an enhancement of sustainable transport networks in the village. These include improvements to pedestrian access to the north end of the beach and an improvement to existing passing places along Horswell Lane. These will contribute towards improved movement and reduced congestion in parts of the parish.

5.10 Conclusions at this current stage

5.10.1 Potential significant effects

The assessment has concluded that the current version of the SMNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' sustainability themes. These benefits largely relate to the SMNP's focus on delivering housing which meets local needs, enhancing the quality of life of residents, including through its focus on improving community infrastructure in the Neighbourhood Plan area and enhancing accessibility to the coast. In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing landscape and villagescape character and the setting of the historic environment, leading to **significant positive effects** in relation to the 'landscape and historic environment' theme.

The current version of the SMNP will initiate a number of beneficial approaches regarding the 'biodiversity', 'land, soil and water resources', 'climate change' and 'transportation' sustainability themes. However these are not 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?

The SMNP has been submitted to the Local Planning Authority, South Hams District Council, for its consideration with this Environmental Report. South Hams District Council will consider whether the plan is suitable to go forward to Independent Examination in terms of the SMNP meeting legal requirements and its compatibility with the Local Plan.

Subject to South Hams District Council's agreement, the SMNP will then be subject to independent examination. The Examiner will consider whether the plan is appropriate having regard to national policy and whether it is in general conformity with the emerging Plymouth and South West Devon Joint Local Plan.

The Examiner will be able to recommend that the SMNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. South Hams District Council will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, South Hams District Council will invite the SMNP Steering Group to make modifications to the plan, which will be reflected in an updated Environmental Report. Where the Examiner's Report recommends that the proposal is to be refused, South Hams District Council will do so.

Where the examination is favourable, the SMNP will then be subject to a referendum, organised by South Hams District Council. If more than 50% of those who vote agree with the plan, then it will be passed to South Hams District Council with a request it is 'made'. Once 'made', the SMNP will become part of the Development Plan for South Milton Parish.

Appendix A Context review and baseline

A.1 Biodiversity

Context Review

At the European level, the EU Biodiversity Strategy⁸ 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:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.
- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP)⁹ 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*

⁸ 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 [30/01/17]

⁹ 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 [02/05/17]

*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*¹⁰.

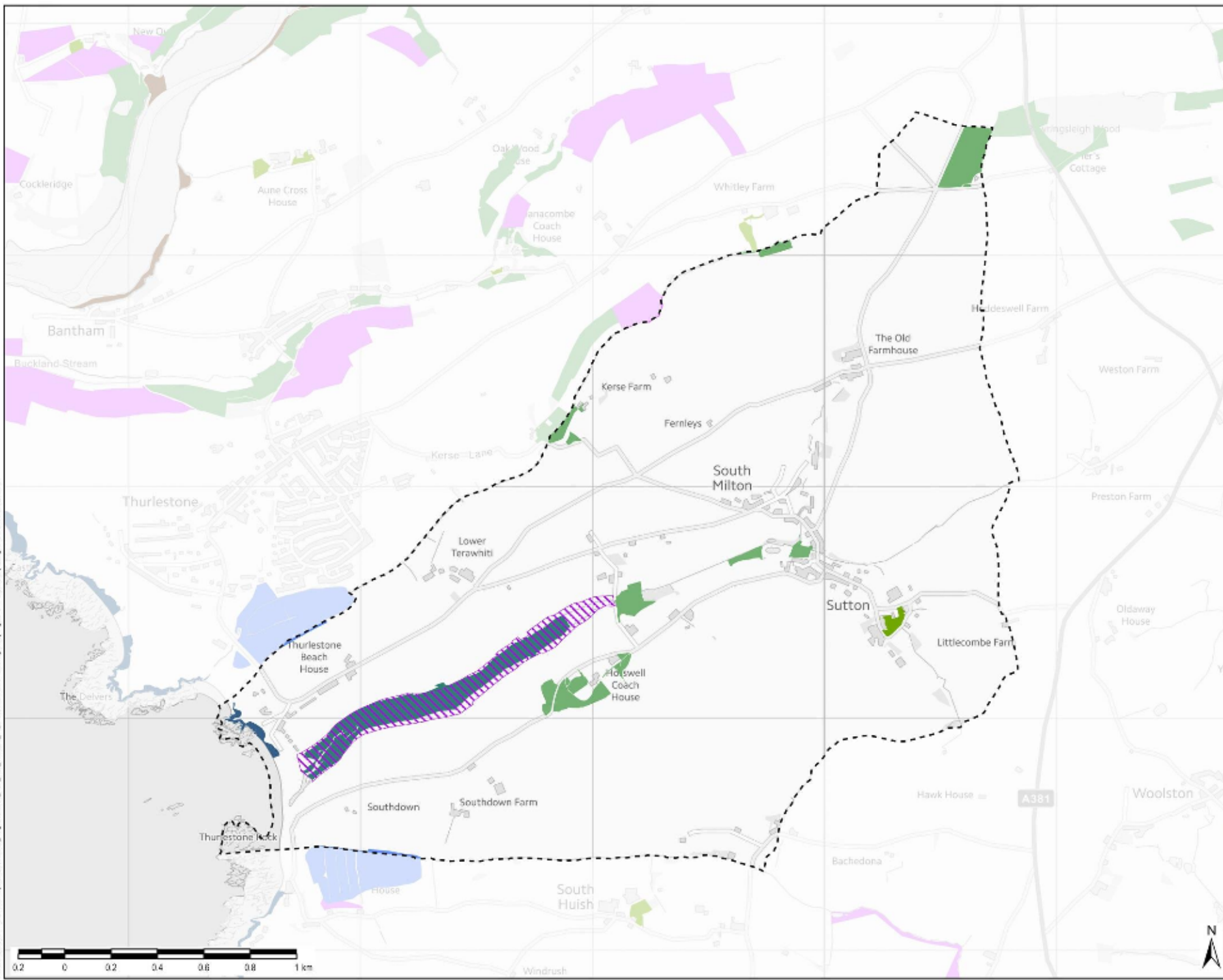
'The Nature of Devon: A Biodiversity and Geodiversity Action Plan' was published in 1998 and revised in 2005 and was produced in collaboration with over 50 organisations by the Devon Biodiversity Partnership. It includes a list of key habitats and species as well as action plans for them. The objectives of the plan still apply today and there is no plan to update the BAP, however the key species list is being updated¹¹.

The Plymouth and South West Devon Joint Local Plan 2014-2034's policy DEV28 (Protecting and enhancing biodiversity and geological conservation) states '*Development should support the conservation, enhancement and restoration of biodiversity and geodiversity across the Plan Area.*' Furthermore, DEV27 – Nationally protected landscapes, SPT11 – Strategic Approach to the Environment, and DEV 30 – Trees, woodlands and hedgerows, are all related to biodiversity or geodiversity.

¹⁰ 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 [02/05/17]

¹¹ Devon County Council (no date): The Devon Biodiversity Action Plan. [online] < <https://new.devon.gov.uk/environment/wildlife> > last accessed [19/04/2017]

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LEGEND

- South Milton Neighbourhood Plan Area
- South Milton Ley Site of Special Scientific Interest (SSSI)
- Biodiversity Action Plan Priority Habitats**
 - Coastal and Floodplain Grazing Marsh
 - Deciduous Woodland
 - Good Quality Semi-Improved Grassland
 - Maritime Cliff and Slope
 - Mudflats
 - Reedbeds
 - Traditional Orchard

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Baseline Summary

Current Baseline

South Milton Ley Site of Special Scientific Interest (SSSI) is the only national designation within the Neighbourhood Plan area and is located wholly within the parish boundary. It is designated for containing priority habitats and species listed in Schedule 1 of the Wildlife and Countryside Act 1981.

IRZs are a GIS tool/dataset which maps zones around each SSSI according to the particular 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. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

The whole of the Neighbourhood Plan area is located with the South Milton Ley SSSI Impact Risk Zone (IRZ). South Milton village lies within an IRZ for residential development of 100 units or more and rural residential of 50 or more houses outside existing settlement/urban area. The south western part of the parish is within an IRZ for any residential development of 10 or more houses outside existing settlements/urban areas.

Parts of the Neighbourhood Plan area fall within the IRZs of two additional SSSIs outside of the parish boundary: Bolt Head to Bolt Tail SSSI (1.5km south); and Salcombe and Kingsbridge Estuary SSSI (2km east).

From DEFRA's 'Magic' GIS database, a European Protected Species licence for a species of bat was given in 2014 in Upton, within the Neighbourhood Plan area, confirming recent presence of bats. *Emberiza cirius* (cirl bunting) was recorded between 2005 and 2009 as being present across the whole of the Neighbourhood Plan area, which is a UK BAP species.

There are a number of UK BAP priority habitats within the Neighbourhood Plan area. The coastal areas north and south and South Milton Sands are priority habitat 'maritime cliffs and slopes'. Priority habitat 'reed-beds' cover the area designated as South Milton Ley SSSI. Other priority habitats present include: 'coastal and floodplain grazing marsh', 'deciduous woodland' and 'traditional orchards'. An important area of key biodiversity habitat in the Neighbourhood Plan area comprises the area known as the South Huish meadowlands.

South Milton Ley SSSI

The South Milton Ley SSSI was notified in 1984 under Section 28 of the Wildlife and Countryside Act 1981 and has an area of 16.2ha. Natural England is the statutory manager of the designation, however part of the SSSI is managed by the Devon Bird Watching Preservation Society. The citation for the SSSI states¹²:

"South Milton Ley is one of the best examples of freshwater reedbed in Devon and is of particular importance for its breeding bird community and for the variety of birds using the site on passage".

The dominant plant species in the lower ley reed swamp is *Phragmites australis* (common reed) while further upstream the vegetation contains a mixture of tall fen species such as *Oenanthe crocata* (hemlock water-dropwort), *Iris pseudacorus* (yellow flag), *Pilobium hirsutum* (great willow herb) and *Glyceria maxima* (reed sweet-grass). The middle and upper regions of the SSSI contain dense stands of *Salix spp.* (willow).

The SSSI also supports a diverse community of breeding birds which are characteristic of freshwater reed-beds including those affording protection under Schedule 1 of the Wildlife and Countryside Act 1981, including: *Cettia cetti* (Cetti's warbler) and *Panurus biarmicus* (bearded reedling). *Motacilla flava* (yellow wagtail) is also present on site, which is a BAP priority species. Further species on site as part of the designation are the *Acrocephalus scirpaceus* (reed warbler), *Acrocephalus schoenobaenus* (sedge warbler) and *Hirundo rustica* (Swallow).

¹² Natural England (no date): 'South Milton Ley SSSI' [online] available to access via: <http://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1002854> > last accessed [19/04/17]

The SSSI is composed of one live unit by which it is assessed. The last assessment took place in 2013 and the site was found to be 'unfavourable-recovering'.

Future Baseline

Future development within the Neighbourhood Plan area may put pressure on habitats and species through impacting on ecological networks. In particular, those priority habitats and species that are not already protected under local or national legislation are most at risk. However, South Milton Ley SSSI is already afforded national protection of its ecological assets, which will limit developmental impacts to the site.

Future impacts of climate change will cause changes to species distribution and habitat composition, increasing the sensitivity of key biodiversity receptors.

A.2 Climate Change

Context Review

In its 2007 strategy on climate change, the European Commission assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.¹³ In relation to energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

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 to achieve the following:

- *'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'*¹⁴

The evidence report contains six priority risk areas requiring additional action in the next five years, see below:

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

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

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gases (GhG), including in terms of meeting the targets set out in the Climate Change Act 2008¹⁵. Specifically, planning policy should support the move to a low carbon future through:

¹³ Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond [online] available at: <<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF>> last accessed [27/01/17]

¹⁴ 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 [27/01/17]

- Planning for new development in locations and ways which reduce GhG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
 - Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act¹⁶ 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)¹⁷

Further guidance is provided in the document 'Planning for SuDS'.¹⁸ 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'.

The Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV35 – Delivering low carbon development, states: *'The need to deliver a low carbon future for Plymouth and South West Devon should be considered in the design and implementation of all developments, in support of the UK's legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels (Climate Change Act 2008).'*

Baseline summary

Current baseline

Potential effects of climate change

The outcome of research on the probable effects of climate change¹⁹ in the UK was released in 2009 by the UK Climate Projections (UKCP09) team¹⁹. UKCP09 gives climate information for the UK up to the

¹⁵ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

¹⁶ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

¹⁷ 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.

¹⁸ 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 [04/02/17]

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 for the south west by 2050 for a medium emissions scenario²⁰ are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.1°C and an increase in summer mean temperature of 2.7°C; and
- The central estimate of change in winter mean precipitation is 17% and summer mean precipitation is –20%.

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

- 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;
- 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.

¹⁹ The data was released on 18th June 2009: See: <<http://ukclimateprojections.metoffice.gov.uk/>> last accessed [04/02/17]

²⁰ UK Climate Projections (2009) South West 2050s Medium Emissions Scenario [online] available at: <<http://ukclimateprojections.metoffice.gov.uk/23687?emission=medium>> last accessed [07/02/17]

Flood Risk

Figure 4.1 displays the flood risk areas present in the Neighbourhood Plan area.

An area of fluvial flood risk extends from the coast to South Milton village. The area, which covers South Milton Ley and its feeder tributary, is located within Flood Zone 3, indicating that there is a 1% (1 in 100) or greater chance of a flood caused by a river happening each year. This represents a high to medium risk.

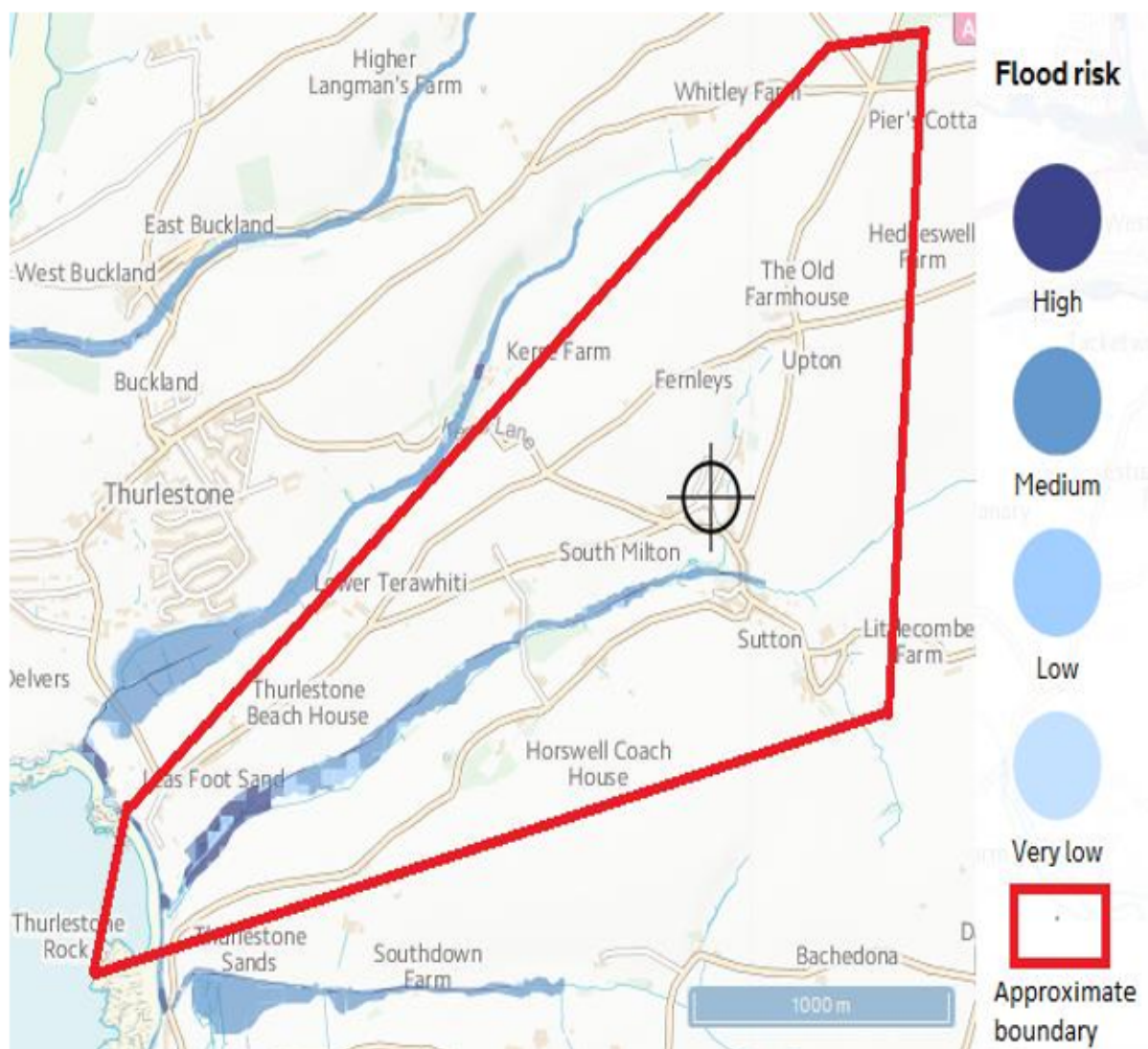


Figure 4.1: Fluvial flood risk within the Neighbourhood Plan area²¹

Surface water drainage and sewer flooding is also a risk for some parts of the Neighbourhood Plan area, seen below in Figure 4.2.

The culvert by the Village Hall has limited capacity, and during severe rainstorms can become overrun, causing water to overflow the highway before finding its way back into the watercourse immediately downstream. Some of the highways in the village have a piped drainage system but this has limited capacity, particularly as the gullies and pipes are easily blocked by silt, gravel and leaves. During storms, much of the runoff from surrounding fields runs along local roads.

²¹ 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 [20/04/17]

In light of these issues, the parish council has implemented a project to reduce flooding in the centre of the village and carries out a preventative maintenance program each year.

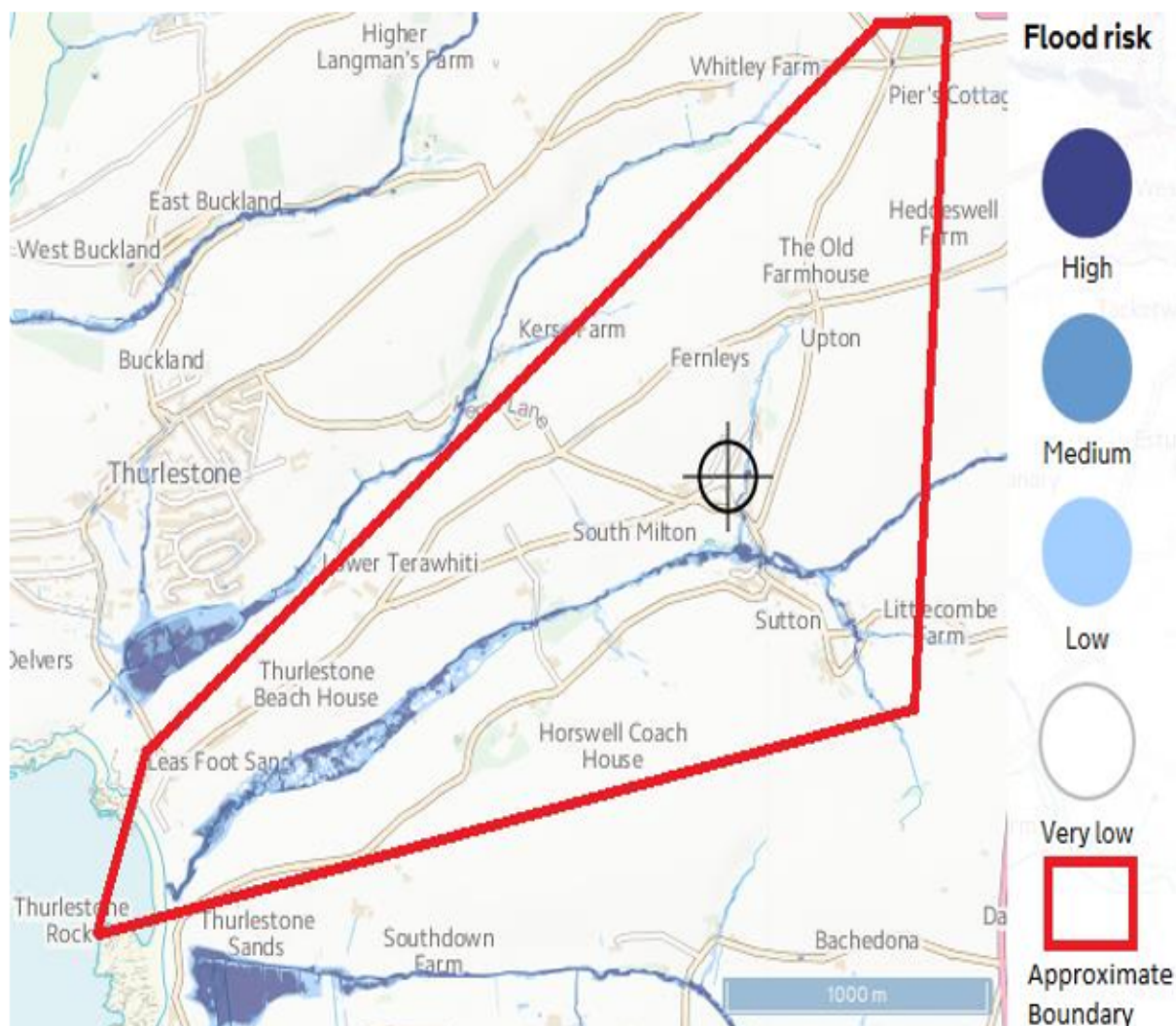


Figure 4.2: Surface water flood risk within the Neighbourhood Plan area

Greenhouse gas emissions

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that South Hams has had consistently higher per capita emissions total than both the South West and England since 2005. Additionally, South Hams has also seen an average reduction in emissions per capita between 2005 and 2012 of 18.6%, a larger reduction compared to the South West (16.4%) and England (16.6% reduction).

Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the South Milton 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 (including fluvial flooding) with an increased need for resilience and adaptation.

In terms of climate change mitigation, per capita emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted.

A.3 Landscape and Historic Environment

Context Review

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

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- 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.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government's Statement on the Historic Environment for England²² 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.

The Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV22- Development affecting the historic environment, states: '*Development proposals will need to sustain the local character and distinctiveness of the area and conserve or enhance its historic environment, heritage assets and their settings according to their national and local significance*'. Furthermore the following policies also directly relate to the landscape and historic environment.

- DEV24 – Landscape Character,
- DEV21 – Conserving the historic environment, and
- DEV27 – Nationally protected landscapes.

Policy DEV25 – undeveloped coast is also specifically related to preventing detrimental effects on the Heritage Coast.

The South Devon Area of Outstanding Natural Beauty (AONB) '*Management Plan 2014-2019*' is of relevance for Neighbourhood Plan area as the entirety of South Milton Parish is within the AONB designation. The vision from the management plan is as follows:

"Our vision for the AONB is a place valued, recognised and treasured forever for its nationally important natural beauty and distinctive character:.."

- *its rugged, undeveloped coastline with wooded estuaries, secluded river valleys, rolling hills, abundant wildlife and rich natural environment;*
- *its distinctive historic landscape character including its patchwork fields, Devon banks and hedges, green lanes, historic settlements and archaeological remains shaped by centuries of*
- *human activity and maritime and farming traditions;*

²² 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 [30/01/17]

- *its rural tranquillity, dark skies, fresh air, clean water, fertile soils and mild climate;*
- *its living, working countryside where community and economic activity sustain the landscape; and*
- *bring prosperity and social well-being to ensure a good quality of life for its residents".²³*
- Within the 'Management Plan 2014-2019', policies Lan/P1-P7 and Hist/P1-P8 relate to the landscape and historic environment element of this SEA theme respectively.

Baseline Summary

Current Baseline

Landscape

The entirety of the Neighbourhood Plan area sits within the South Devon AONB. Within the recent 'Management Plan 2014-2019' for the AONB, a list of special qualities which define the unique 'natural beauty' of the designation was produced. All of the listed special qualities are relevant to the landscape of South Milton Neighbourhood Plan area, and are as follows:

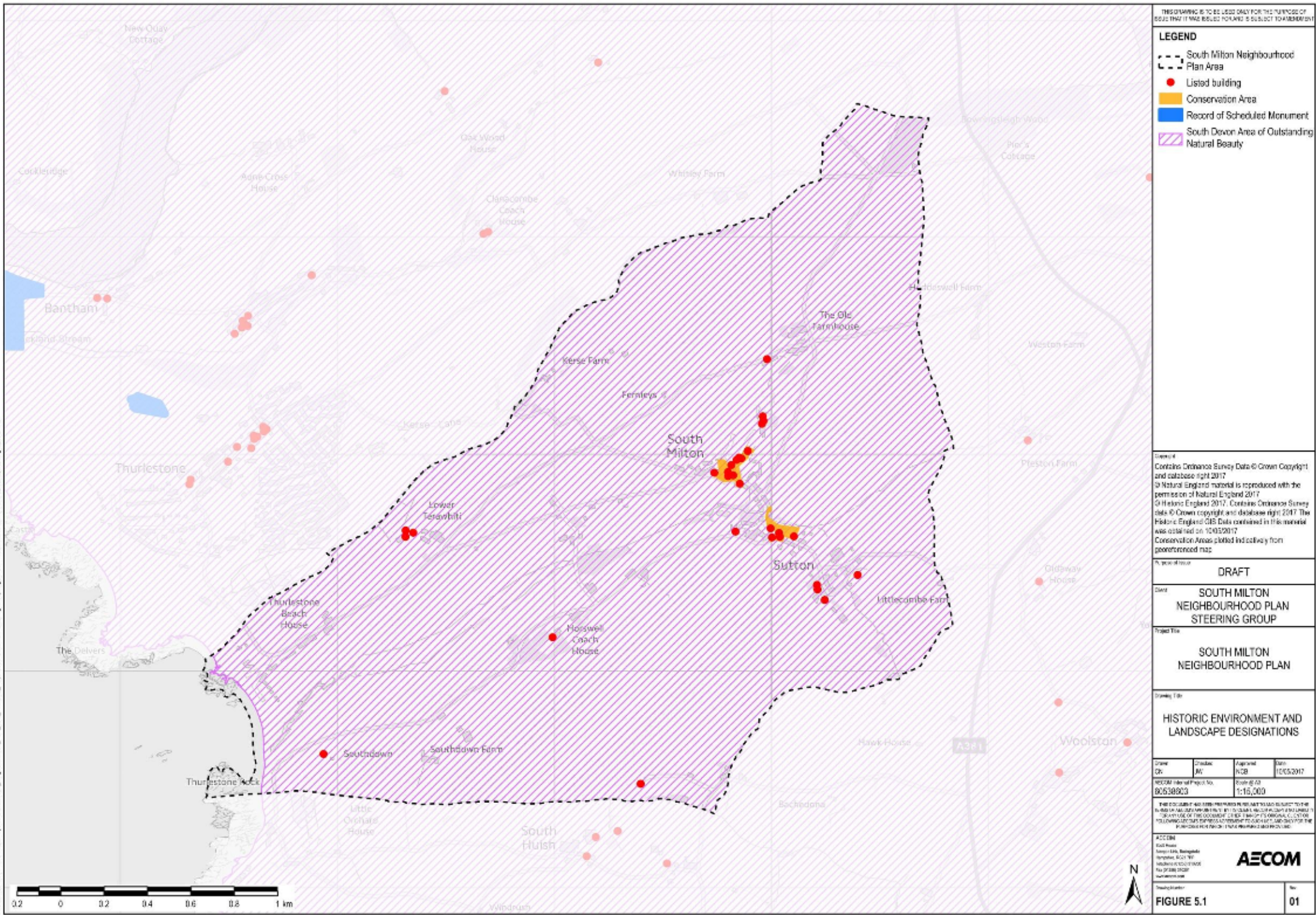
- Fine, undeveloped, wild and rugged coastline;
- Ria estuaries (drowned river valleys), steep combes and a network of associated watercourses;
- Deeply rural rolling patchwork agricultural landscape;
- Deeply incised landscape that is intimate, hidden and secretive away from the plateau tops;
- Iconic 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; and
- Areas of high tranquillity, natural nightscapes, distinctive natural soundscapes and visible movement.

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 its character. The Neighbourhood Plan area is located within NCA 151.

There are a number of key characteristic associated with NCA 151. Those that are relevant to the Neighbourhood Plan area are as follows:

- Rounded hills, without strong patterns, separated by steep, intricate wooded valleys with fast flowing rivers.
- Diverse and complex coastline, often reaching deep inland along rias and estuaries. Distinctive cliff formations with raised beaches and caves.
- Arable and pasture fields, with larger fields on the higher flatter land and a more intact, smaller irregular field pattern on the valley flanks. When ploughed the characteristic red soils add to the pattern of the landscape.
- Wildflower rich, often treeless, hedgebanks providing field boundaries and borders to the typical narrow sunken lanes linking scattered farmsteads and hamlets.
- Villages and towns generally in sheltered valley locations or at the heads of rias, with the larger urban settlements located at either end of the coastal stretch. Rural buildings of local stone and slate, with some cob and thatch.

²³ South Devon AONB (2014) Management Plan 2014-2019 Part 1: Strategy



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LEGEND

- South Milton Neighbourhood Plan Area
- Listed building
- Conservation Area
- Record of Scheduled Monument
- South Devon Area of Outstanding Natural Beauty

Drawn by:
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 Conservation Areas plotted in accordance with georeferenced map

As issued: **DRAFT**

Client: **SOUTH MILTON NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title: **SOUTH MILTON NEIGHBOURHOOD PLAN**

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

Drawn by:	Checked by:	Approved by:	Date:
AW	AW	PCB	10/05/2017
NECMA Internal Project No:		Scale @ A3:	
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Drawing Number: **FIGURE 5.1** No: **01**

Historic Environment

The Neighbourhood Plan area has a rich historic environment. Numerous features are recognised through the historic environment designations. 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. Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'.

The Neighbourhood Plan area contains one Grade I listed building and 34 Grade II listed buildings. The Grade I listed building is the Church of All Saints, located in South Milton village.

There are no Scheduled Monuments within the Neighbourhood Plan area, the closest being the 'Four Bowl Barrows 270m West of the Downs', located 1,300m north-west of South Milton parish. Additionally, there are no registered parks and gardens or battlefields designated within the Neighbourhood Plan area.

There is one conservation area with the Neighbourhood Plan area (the South Milton Conservation Area), comprising two parts of South Milton village. Additionally, most of the Neighbourhood Plan area falls within the 'South Devon Heritage Coast'. Heritage Coasts are not designated but defined to conserve the undeveloped nature of these areas. They are protected within the planning system under paragraph 114 of the National Planning Policy Framework 2012²⁴.

It should be noted that not all of the historic environment features within the Neighbourhood Plan area is 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 interest and are seen as important by the local community. An example in South Milton is the Village Hall.

Future baseline

New development has the potential to lead to incremental but small changes in landscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and visual impact. However, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there is opportunity for new development to enhance the historic setting of the town and better reveal assets' cultural heritage significance, educating both local residents and visitors to South Milton parish.

Existing historic environment designations in the form of listed buildings and the heritage coast will support the protection of key features and areas of historic interest within the Neighbourhood Plan area.

A.4 Land, Soil and Water Resources

Context Review

The EU's Soil Thematic Strategy²⁵ presents a strategy for protecting soils 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.

The Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention to establish a 'framework

²⁴ DCLG (2012) 'National Planning Policy Framework' [online] available via: <<https://www.gov.uk/government/publications/national-planning-policy-framework--2>> last accessed [21/04/2017]

²⁵ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [30/01/17]

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; and
- Ensure the progressive reduction of groundwater pollution.

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

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- 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'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Other key documents at the national level include Safeguarding our Soils: A strategy for England²⁶, which sets out a vision for soil use in England, and the Water White Paper²⁷, 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 England²⁸ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The Neighbourhood Plan area lies within the South West River Basin Management Plan (RBMP) 2009 area. A key action for the South Hams is the management of diffuse water pollution from agriculture through the 'England Catchment Sensitive Farming Deliver Initiative'.

The Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV2 – Air, water, soil, noise and land, states: '*development proposals which will cause unacceptable harm to human health or environmental quality by unacceptable levels of soil, air, water or noise pollution or land instability will not be permitted*'. Baseline summary

Current Baseline

Soil pollution

The Neighbourhood Plan area does not have a history of heavy industrial land use. No recorded significant or major industrial pollution incidents have been recorded by the Environment Agency

²⁶ 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 [30/01/17]

²⁷ 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 [30/01/17]

²⁸ 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 [30/01/17]

under the EC Integrated Pollution Prevention and Control Directive (IPCC)²⁹. This does not preclude the potential for localised soil or groundwater contamination to be present.

There are no current or historic landfill sites within the Neighbourhood Plan area. There is an historic landfill site located 300m north-west of the Neighbourhood Plan area boundary at Easton Court Farm, which took inert and industrial waste between 1972 and 1994.

Quality of agricultural land

The Agricultural Land Classification classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. Through an assessment of the soil quality³⁰ of the Neighbourhood Plan area, the highest quality is land adjacent to the north of the South Milton Ley SSSI, which is Grade 2. The poorest quality of soil is the area around the reed-bed system and along the drainage channel leading to South Milton village, which is classified as Grade 4 land.

The remaining land within the Neighbourhood Plan area is Grade 3. Recent agricultural land classification has not been undertaken in this area. As such, it is uncertain whether the land is Grade 3a agricultural land (and as such is classified as the best and most versatile) or Grade 3b land (which is not classified as the best and most versatile).

Waste and recycling centres

A South West Water Services Ltd sewage works is located within the Neighbourhood Plan area, adjacent to the north of the South Milton Ley SSSI. This treatment plant overflows directly into the watercourse from time to time, and there are occasional pollution incidents caused by blockages in the sewer network.

There are no recycling centres within the Neighbourhood Plan area. The closest recycling centre is located in Thurlestone 500m north-west of the Neighbourhood Plan area boundary.

Watercourses

There are no major watercourses flowing through the Neighbourhood Plan area, but there is a network of streams, drainage channels and a reed-bed swamp area associated with the South Milton Ley SSSI. The streams arise north and east of South Milton village, before flowing into the drainage channels west of the town, flowing into the reed-bed swamp area of the South Milton Ley SSSI, before exiting at South Milton Sands to Bigbury Bay.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. In the Neighbourhood Plan area there are no SPZs and none are within proximity of the area boundary.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. There is a NVZ for groundwater that covers the northern part of the Neighbourhood Plan area, as well as beyond the parish boundaries to the River Avon.

²⁹ Environment Agency Interactive Map: 'Pollution Incidents' [online] accessible via: <<http://apps.environment-agency.gov.uk/wiby/default.aspx>> last accessed [20/03/17]

³⁰ MAGIC Interactive Map (2017): 'Landscape; Post 1988 Agricultural Land Classification (England)' [online] layer available to view using the following mapping tool: <<http://www.magic.gov.uk/MagicMap.aspx>> last accessed [21/04/17]

Future baseline

The Neighbourhood Plan area has relatively good land quality, with no recorded significant pollution incidents or historic landfill activity and areas of good agricultural soil quality.

Future development may cause increased pollution of the sensitive watercourses of the Neighbourhood Plan area, as increased development and agricultural activity has the potential to increase runoff of nitrates and other pollutants. However, the requirements of the Water Framework Directive (and its successor) are likely to lead to continued improvement to water quality in the area.

A.5 Population and Community

Context Review

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

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities 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.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- 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.
- 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' is of 'great importance' and there is a need to take 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 Change³¹ warns that society is underprepared for an ageing population. The report

³¹ 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 [03/05/17]

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 latest version of the Plymouth and South West Devon Joint Local Plan 2014-2034 presents a range of policies which are related to the Population and Community theme. These are as follows;

- SO11 – Delivering high quality development
- SO8 – Maintaining the vitality and viability of the Smaller towns and Key Villages
- DEV9 – Meeting local housing need in the Plan Area
- DEV10 – Delivering high quality housing
- DEV32 – Meeting the community infrastructure needs of new homes
- TTV30 – Empowering local residents to create strong and sustainable communities
- SPT3 – Provision for new homes
- DEV18 – Protecting local shops and services.

Baseline summary

Current baseline

Population

Population growth 2001-2011³²

Date	South Milton	South Hams	South West	England
2001	408	81,849	4,928,434	49,138,831
2011	385	83,140	5,288,935	53,012,456
Population Change 2001-2011	-5.6%	+1.6%	+7.3%	+7.9%

According to the most recently available census data (see table above) South Milton saw a decreasing population (-5.6%) between 2001 and 2011. This is in contrast to the South Hams (+1.6%), the South West (+7.3%) and England (+7.9%), which all saw increases in population in that time period.

³² ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

*Age structure***Age Structure (2011)³³**

	South Milton	South Hams	South West	England
0-15	14.4%	15.9%	17.5%	18.9%
16-24	6.8%	8.8%	11.3%	11.9%
25-44	15.6%	19.5%	24.6%	27.5%
45-59	21.8%	23.0%	20.1%	19.4%
60+	41.3%	32.8%	26.4%	22.3%
Total Population	385	83,140	5,288,935	53,012,456

The percentage of residents living within the Neighbourhood Plan area aged between 0-24 is 14.4%, which is lower than the averages for South Hams (15.9%), the South West (17.5%) and England (18.9%). The largest proportion of residents with the Neighbourhood Plan area is aged 60+ (41.3%), which is significantly higher than the average for South Hams (32.8%), the South West (26.4%) and England (22.3%). The working population (those residents aged 25-59) of residents within South Milton parish is 37.4%, is lower than South Hams (42.5%), the South West (44.6%) and England (46.9%). South Milton Parish therefore supports an older population.

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.

Relative household deprivation dimensions³⁴

	South Hams 012C (LSOA)	South Hams	South West	England
Household not deprived	47.8%	47.8%	44.8%	42.5%
Deprived in 1 dimension	36.7%	33.5%	33.2%	32.7%
Deprived in 2 dimensions	13.6%	15.5%	17.6%	19.1%
Deprived in 3 dimensions	1.9%	3.0%	4.0%	5.1%
Deprived in 4 dimensions	0.0%	0.2%	0.4%	0.5%

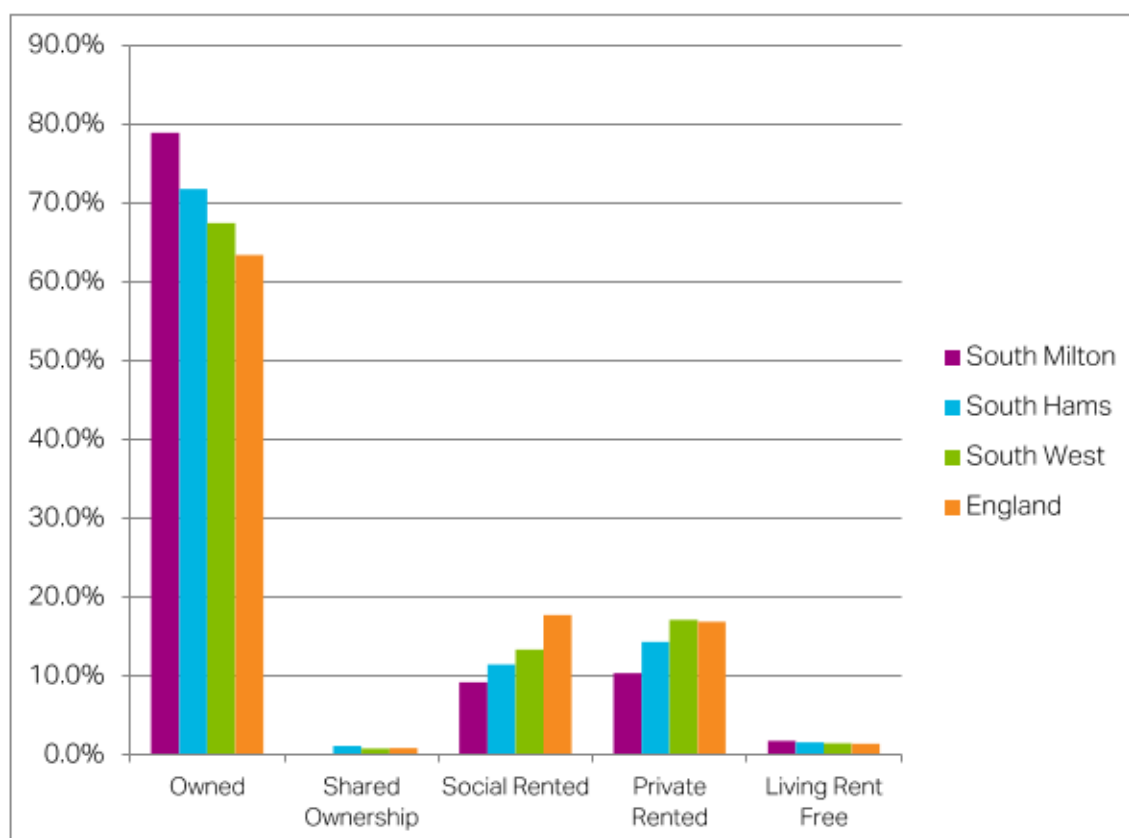
³³ ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

³⁴ ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

South Milton parish resides within the Lower Layer Super Output Area (LSOA) of South Hams 012C. For deprivation figures, this is used as a measure as census data is not available at a parish level.

Based on the most recently available census data (see table above), 52.2% of households within the LSOA are at least deprived in 1 dimension, which aligns with the average for South Hams (52.2%) but is lower than the South West (55.2%) and England (57.5%). The LSOA has a slightly high percentage of households deprived in one dimension relative to the local, regional and national average. However it is consistently lower in its percentage of households deprived in 2 and 3 dimensions. Additionally, South Milton parish does not have any households deprived in all 4 dimensions, unlike its local, regional and national counter parts.

Housing tenure

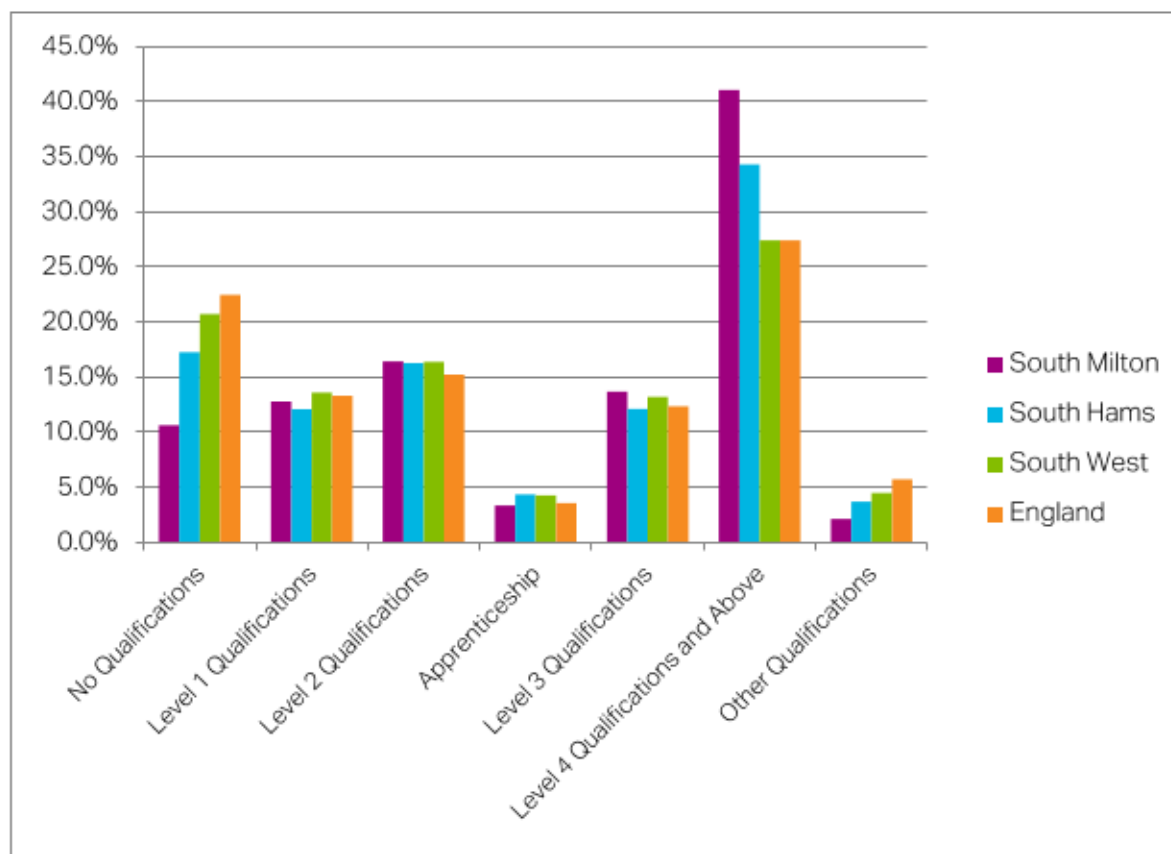


Tenure by Household ³⁵

The majority of residents within South Milton parish (78.9%) own a home either outright or with a mortgage (see chart above), which is significantly higher than averages for South Hams (71.7%), the South West (67.4%) and England (63.3%). The percentage of residents in socially rented households broadly aligns with the South Hams average, but is 4.2% and 8.6% lower than the South West and England averages respectively. Furthermore, fewer people in South Milton parish live in privately rented households compared to local, regional and national averages.

³⁵ ONS (no date): Census 2011: Tenure-Households 2011 (Table QS405EW)

Education



Highest level of Qualification ³⁶

With regards to the most recently available census data (see figure above), 41.0% of residents within the Neighbourhood Plan area have 'Level 4 Qualifications and above' which is significantly higher than the average for South Hams (34.3%), the South West and England (both 27.4%). The Neighbourhood Plan area broadly aligns for 'Level 2 Qualifications' and 'Level 3 Qualifications' with the averages of the South Hams and the South West. For all other criteria, the Neighbourhood Plan area is lower than the regional and national averages. 10.6% of residents within the Neighbourhood Plan area have 'No Qualifications', which is significantly less than South Hams (17.2%), the South West (20.7%) and England (22.5%).

³⁶ ONS (no date): Census 2011: Highest Level of Qualification 2011 (Table QS501EW)

Employment

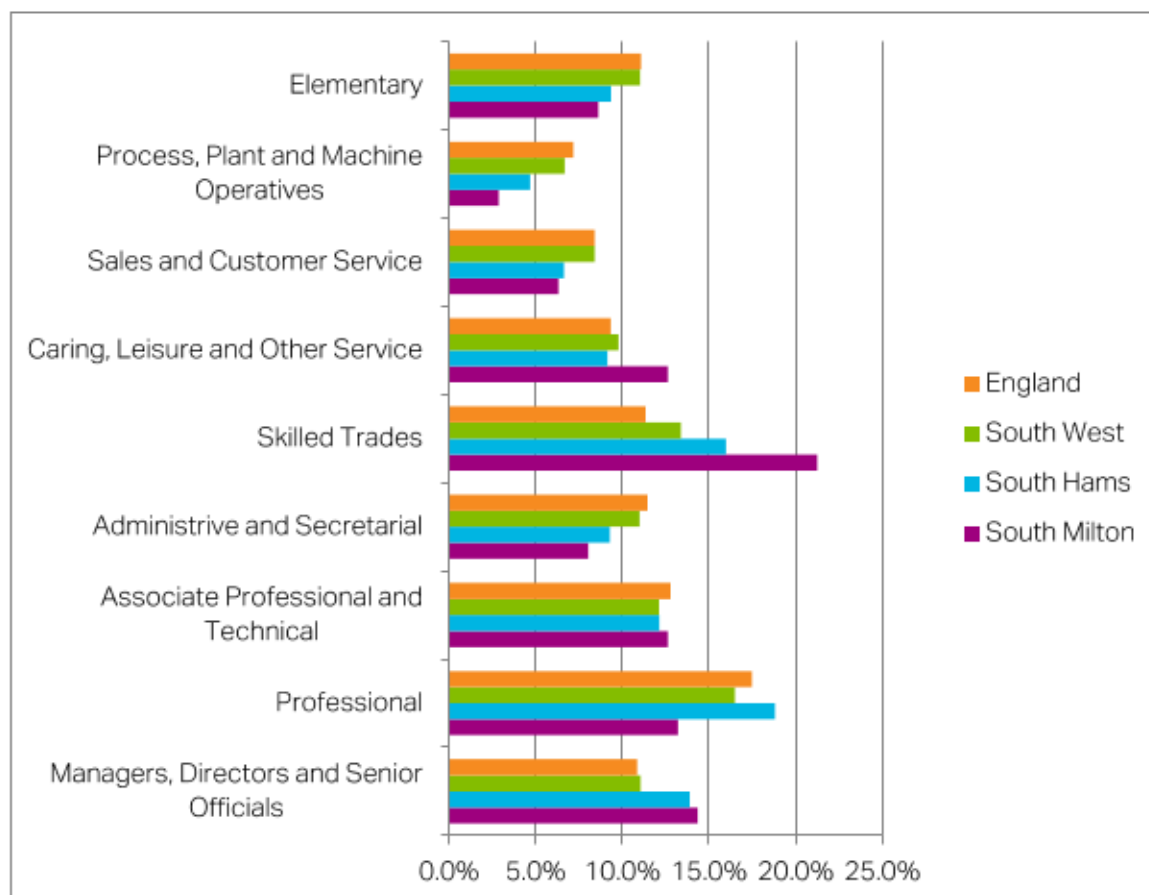


Figure: 'Occupation of usual residents aged 16 to 74 in employment'³⁷

As highlighted in the figure above, there is a significantly higher proportion of residents (aged 16-74) in South Milton parish who are employed in skilled trade occupations (21.3%) compared with South Hams (16.0%), the South West (13.4%) and England (11.4%). There is also a significantly higher percentage of people employed in Caring, Leisure and Other service as well as Managers, Directors and Senior Officials than the local, regional and national averages. Conversely, the percentage of residents within the Neighbourhood Plan area that are employed in Process, Plant and Machine Operatives (2.9%) is significantly less than the averages for South Hams (6.7%), the South West (6.7%) and England (7.2%). The percentage of residents in the remaining occupations listed is lower than the district, regional and national averages.

Future Baseline

In contrast to district, regional and national trends, the population of the Neighbourhood Plan area decreased between 2001 and 2011. 41.3% of residents within the parish are over the age of 60, indicating the presence of an older and ageing population within the Neighbourhood Plan area. However recent trends have suggested an increase in the population, including from in-migration and from younger age groups.

Improved connectivity and 'agile working' is likely to increase the number of people seeking to work from home or run a business from home. This provides opportunities for the parish in terms of the economy and employment opportunities.

³⁷ ONS (no date): Census 2011: 'Occupation 2011' (Table KS608EW)

A.6 Health and Wellbeing

Context Review

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'
- 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.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives³⁸ (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 Joint Strategic Needs Assessment (JSNA)³⁹ for Devon identifies key features of interest within the area and raises important issues for discussion. The main challenges in Devon have been identified to be population, equality and diversity, economy, community and environment, deprivation, starting well, living well and ageing well.

The Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV1 – Protecting health and amenity states: *'Development proposals will be required to safeguard the health and the amenity of local communities. In addition to measures set out in other policies of the plan, this will be through, as appropriate:*

- 1 *Ensuring that new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise disturbance for both new and existing homes. Unacceptable impacts will be judged against the level of amenity generally in the locality.*
- 2 *Ensuring that developments and public spaces are designed to be accessible to people with disabilities or for whose mobility is impaired by other circumstances.*
- 3 *Requiring a Health Impact Assessment to be submitted as part of any Environmental Impact Assessment submitted in relation to planning applications for major development proposals.'*

³⁸ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <<http://www.apho.org.uk/resource/item.aspx?RID=106106>> last accessed [27/01/17]

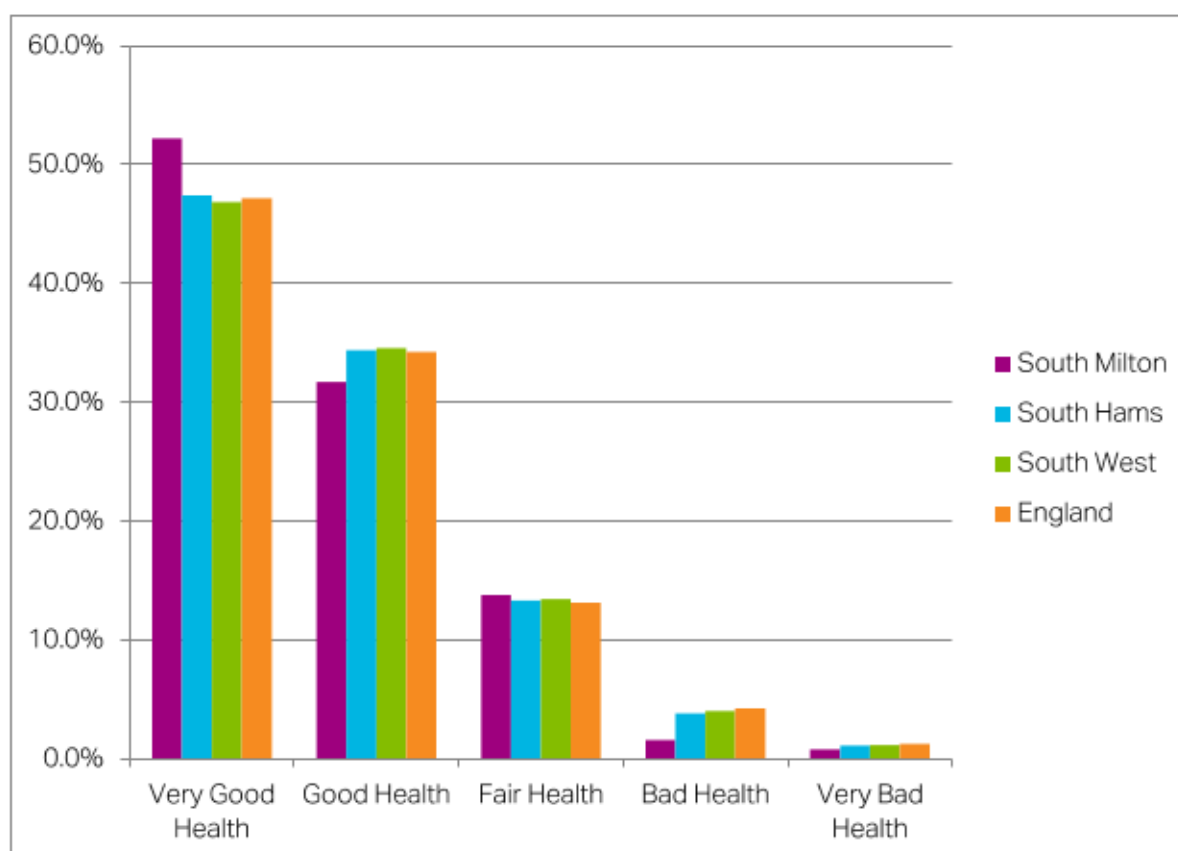
³⁹ Devon County Council (2015) Joint Strategic Needs Assessment Devon Overview [online] available via: <http://www.devonhealthandwellbeing.org.uk/wp-content/uploads/2015/06/JSNA_Devon_Overview_2015.pdf> last accessed 26/04/17

Baseline summary

Current Baseline

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 above. As highlighted in the figure below, general health is relatively favourable in the Neighbourhood Plan area, with 83.9% of residents reporting either 'very good health' or 'good health' in the most recent census. This is slightly higher than the value for South Hams (81.8%), the South West (81.4%) and England (81.4%). Comparatively, 2.3% of residents in the Neighbourhood Plan area report either 'bad health' or 'very bad health', which is lower than the values for the South Hams (4.9%), the South West (5.2%) and England (5.5%).



General Health⁴⁰

The lower than average levels of 'very bad health' and 'bad health' within the Neighbourhood Plan area broadly aligns with the disability data presented in the table below. 6.0% of residents within the Neighbourhood Plan area reported their 'activities were limited a lot', which is 2.2% lower than South Hams and 2.3% lower than the South West and England averages. Overall, the number of residents with reported some limitation of activities within the Neighbourhood Plan area is broadly aligned with district, regional and national averages

⁴⁰ ONS (no date): Census 2011: 'General Health 2011' (Table QS302EW)

Disability⁴¹

	South Milton	South Hams	South West	England
Activities limited 'a lot'	6.0%	8.2%	8.3%	8.3%
Activities limited 'a little'	12.5%	11.0%	10.2%	9.3%
Activities 'not limited'	81.6%	80.8%	81.6%	82.4%

Future baseline

Residents within the Neighbourhood Plan area will continue to have access to the South Hams Hospital/Kingsbridge Community Hospital which is approximately a ten minute drive east of South Milton village.

An ageing population has the potential to place pressures on health services.

A.7 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.

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. In this context 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'.*

The Plymouth and South West Devon Joint Local Plan 2014-2034 policy SPT9 (Strategic principles for transport planning and strategy) states that the 'Local Planning Authorities and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver an integrated approach to transport and planning, delivering a strategic approach to transport. This is supported by policy DEV32 (Specific provisions relating to transport).

⁴¹ ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

Baseline summary

Current Baseline

Rail network

There are no railway stations located within the Neighbourhood Plan area. Additionally, there is no railway station in Kingsbridge, the nearest urban centre. The closest railway stations are at Ivybridge, which is located 20km from South Milton village, and Totnes, which is located 25km away. Both are on the main Penzance/Plymouth to Exeter railway line, however significantly more services serve Totnes than Ivybridge. In this context mainline services from Totnes are operated by Great Western Railway and CrossCountry Trains. Great Western Railway run direct services from Totnes to Plymouth, Truro and Penzance in the west and Newton Abbot, Exeter, Taunton, Reading and London Paddington to the east, and CrossCountry Trains operate direct services to Plymouth, Cornwall, Newton Abbot, Exeter, Taunton, Bristol, Birmingham, the north of England and Scotland.

Bus network

In regards to the bus network, as of April 2017, there is only one bus service (SH162) that passes through the Neighbourhood Plan area. Another bus service (the 606) runs adjacent to the parish and is used by residents within the Neighbourhood Plan area. The service provider for both is 'Tally Ho'. Further details on the services are provided in the table below.

Main bus routes within or adjacent to the Neighbourhood Plan area⁴²

Service and Service Provider	Route Details	Regularity of Service
SH162 (Tally Ho)	Kingsbridge – Hope via Thurlestone	Five services throughout day leaving Kingsbridge at: 08:20, 08:50, 12:00, 15:15 and 17:30.
606 (Tally Ho)	Kingsbridge - Salcombe	Provides hourly service leaving Kingsbridge/Salcombe approximately between 08:00 and 20:00

Road network and congestion

There are no major roads within the Neighbourhood Plan area. The road network within the area is made up of country lanes flanked by hedgerows and trees.

There is one A road adjacent to South Milton Parish, the A381. The A381 is the main north-south route from Totnes to Kingsbridge and Salcombe. This links with the A379, which is the main route linking Plymouth to Kingsbridge.

There are a number of access points into the Neighbourhood Plan area from the A381. Congestion within the parish arises along the single lane roads when on-coming vehicles meet and are not able to pass. Particular congestion issues arise during the peak visitor season.

Cycle and Footpath network

The National Cycle Route 28 extends from Okehampton to Plymouth via Newton Abbot, Totnes and Salcombe. The route passes through the Neighbourhood Plan area through South Milton village and past South Milton Sands on the coast.

The South West Coast Path runs through the Neighbourhood Plan area along the coastline. This is a long distance footpath used by both residents and visitors. There are a number of footpaths and

⁴² Tally Ho! (no date) Bus Services, [online] available at: < <http://www.tallyhocoches.co.uk/corporate/busservice.aspx> >last accessed [24/04/17]

bridleways that run throughout the parish and connect it to the South West Coast Path. In particular, a footpath connects South Milton village to the coast, running parallel to the south of South Milton Ley. This path does not however extend all the way to the coast; for the last 500m to the coast it runs along the road.

Availability of cars and vans

In regards to access to vehicles within the Neighbourhood Plan area, 4.0% of residents reported not having access to a car or van. This is significantly lower than the value for the South Hams (13.3%), the South West (18.9%) and England (25.8%). Additionally, the percentage of residents in the Neighbourhood Plan area that have two or more cars is higher than the local, regional and national averages.

Travel to work

Based on the most recent census data, the most popular method of traveling to work in South Milton Parish is via driving a car or van (38.2%), slightly lower than the average for South Hams (41.1%) and the South West (41.4%), but 1.3% higher than the national average of 36.9%. After driving, the second most popular method of travelling to work in South Milton parish is on foot (3.9%), which is lower than the local, regional and national average.

Future Baseline

Public transport usage has the potential to remain relatively low compared to private car use in the area, although there is potential to increase sustainable transport use and active travel such as cycling. Bus services serving the Neighbourhood Plan area may come under increasing pressures from budgetary constraints and associated cuts in funding.

There is potential for the number of people working from home in South Milton to significantly increase due to modern working patterns such as agile and flexible working.

Whilst negative effects of new development on the local transport network are likely to be in part mitigated by provisions in the Devon Transport Plan and The Plymouth and South West Devon Joint Local Plan 2014-2034, overall increases in car use may arise as a result of growth in the Neighbourhood Plan area and a growth in visitor numbers.

