

# Strategic Environmental Assessment for the Silverton Parish Neighbourhood Plan

Environmental Report to accompany the Regulation 14  
consultation on the Neighbourhood Plan

Silverton Parish Council

July 2020

## Quality information

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## Revision History

Revision	Revision date	Details	Name	Position
V1	12 <sup>th</sup> February 2020	Draft for internal review	Rosie Cox	Environmental Planner
V2	21 <sup>st</sup> February 2020	Draft for group comment	Bill Croome	Silverton Parish Council
V3	25 <sup>th</sup> February 2020	Consultation version	Rosie Cox	Environmental Planner
V4	30 <sup>th</sup> June 2020	Updated draft for Locality review	Nick Chisholm- Batten	Associate Director
V4	06 <sup>th</sup> July 2020	Locality review	John Wilkinson	Neighbourhood Planning Officer
V5	21 <sup>st</sup> July	Final	Rosie Cox	Environmental Planner

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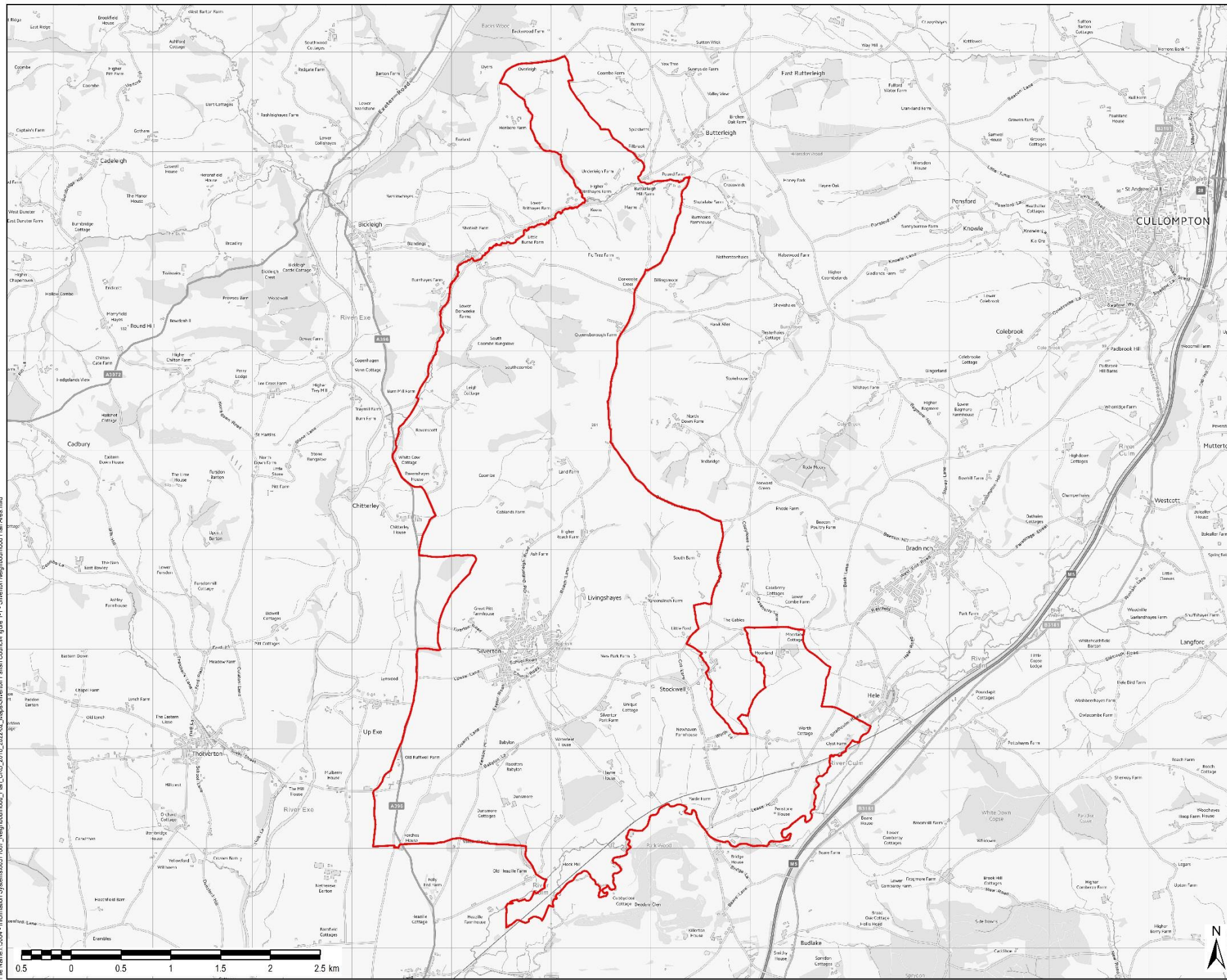
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**LEGEND**

Silverton Neighbourhood Plan Area

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Purpose of Issue  
**FINAL**

Client  
**SILVERTON PARISH COUNCIL**

Project Title  
**SEA FOR THE SILVERTON NEIGHBOURHOOD PLAN**

Drawing Title  
**SILVERTON NEIGHBOURHOOD AREA**

Drawn CN	Checked JW	Approved RC	Date 07/03/2019
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**FIGURE 1.1**

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# Non-technical summary

## What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Silverton Parish 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 Silverton Parish Neighbourhood Plan?

The Silverton Parish Neighbourhood Plan (SPNP) presents a plan for the administrative area of the Parish for the period to 2031. The SPNP is being prepared to be in conformity with the existing Local Plan, which currently includes the Core Strategy (2007), the Allocations and Infrastructure Development Plan Document (2010) and Development Management Policies Document (2013); and in the context of the emerging Mid Devon Local Plan Review.

The SPNP 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, landscape and villagescape character, the quality of life of residents, and the protection and enhancement of the environment.

It is currently anticipated that the SPNP will be submitted to Mid Devon District Council later in 2020.

## Purpose of this Environmental Report

This Environmental Report, which accompanies the current Regulation 14 consultation version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (March 2019), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

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

The Environmental Report contains:

- An outline of the contents and main objectives of the Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Neighbourhood Plan;
- The likely significant environmental effects of the Neighbourhood Plan;

- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Neighbourhood Plan; and
- The next steps for the Neighbourhood Plan and accompanying SEA process.

## Assessment of reasonable alternatives for the SPNP

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the SPNP. The SEA Regulations 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'.

Alternative approaches have been considered in relation to the location of housing to be delivered.

## Assessment of housing sites for allocation through the SPNP

The SPNP being prepared in the context of the existing Local Plan, which currently includes the Core Strategy (2007), the Allocations and Infrastructure Development Plan Document (2010) and Development Management Policies Document (2013). The SPNP is also being prepared in the context of the emerging Mid Devon Local Plan Review.

In accordance with the strategic context of the Local Plan, Mid Devon District Council have confirmed a housing target of 13 dwellings for Silverton Parish. The Local Plan Review document allocates two sites for housing within Silverton Parish (8 dwellings at Land at Old Butterleigh Road; and 5 dwellings at The Garage). Both sites have since been consented for a total of 10 dwellings (5 dwellings at Land at Old Butterleigh Road and 5 dwellings at The Garage). This leaves a residual housing need of at least three dwellings.

Subsequent to Regulation 14 consultation on the Neighbourhood Plan (June 2020), outline planning has been granted on appeal for up to 20 dwellings, on the field north of Applemead/ Silverdale.

While the housing target for the area is now being met and exceeded by the Applemead/ Silverdale site, the Parish Council nonetheless seeks to allocate additional land for new housing through the SPNP. This is with the aim of delivering future housing development that is appropriately small in scale so as not to have an adverse effect on the visual amenity and essential infrastructure of the area.

In order to explore potential site options for allocation the Parish Council firstly looked to the SHLAA (2014), and subsequently put out a Call for Sites (CfS) to local landowners (2016). Using the SHLAA and the response to the local CfS, six areas of land in and around the village of Silverton were short-listed as potential locations for housing allocations to be taken forward for the purposes of the Neighbourhood Plan:

- Site A - Wests Garage
- Site B - Tiverton Road
- Site C - Roosters
- Site D - The Glebe
- Site E - Hillcrest
- Site F - Old Butterleigh Road

The locations of these sites are presented in **Figure 4.1** of this Environmental Report.

To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the six sites and potential effects that may arise as a result of housing development at these locations. In this context the sites have



been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping and the baseline information.

**Table NTS.1** below presents a summary of this appraisal and provides an indication of each site's sustainability performance in relation to the eight SEA themes.

**Table NTS.1 Summary of SEA Site appraisal findings**

Site	Biodiversity	Climate change	Historic env	Landscape	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Site A								
Site B								
Site C								
Site D								
Site E								
Site F								

Site A followed by Site B is best performing against the SEA objectives, with Sites C and E being the least well performing options. All sites performed positively against the Population and community SEA Objectives given they will contribute positively towards meeting local housing need, however it is recognised that Site C is isolated from the existing settlement. Sites differ in performance against all other SEA Objectives. Taking each in turn:

Positive effects are predicted for Site D and F against Health and Wellbeing as these sites are located adjacent to the village centre, supporting healthy modes of travel for local services, facilities and recreation. Neutral effects are predicted for Sites A and B as these sites are within approx. 10 min walking distance of village services, however the safety of these roads for pedestrians are a concern locally. Sites C and E perform negatively given the distance of the site from the village centre, and the potential loss of community allotment space, respectively. Negative effects are therefore also anticipated for Site C against the Transportation Objective.

Sites A and E also perform negatively against the Transportation SEA Objective due to unconfirmed vehicle access at these sites. All other sites are concluded uncertain due to the safety and accessibility points discussed above (in addition to the absence of sustainable travel options).

Sites B, D, E and F perform negatively against the Land, Soil and Water SEA Objective given the likely loss of Best and Most Versatile (BMV) agricultural land and (in terms of Site E) productive allotment land. Effects are uncertain for Site E in this respect, and likely to be negligible overall given the size of the site and subsequent very limited loss of land. Sites A and C perform positively given they are brownfield sites and would be directing development away from BMV land.

In terms of Landscape, Sites A and B perform positively given they are small, well screened, brownfield sites. Neutral effects are anticipated for Site F given its location nestled between existing development and vegetative screening present. Effects are uncertain for Site E as while a small infill site in the village, localised effects on townscape may result. Site C performs least well in this respect, given its location in the open countryside away from the existing settlement.

Site D performs negatively against the Historic Environment objective given the site is partially within the Silverton Conservation Area, and potential effects on long distance views and the setting of church tower of St Mary the Virgin (Grade I Listed) as set out in the Silverton Conservation Area Appraisal. Sites A and F also have the potential to impact upon the Conservation Area, however effects are currently uncertain at this stage. Additionally, development of this brownfield site offers the potential to deliver enhancements to the quality of the built environment which benefits the setting of the historic environment, if high quality design and layout are incorporated within new development. Neutral effects are anticipated for Sites B, C, and E, given that no historic environment designations are present in the setting of the sites.

All sites with the exception of Sites E and F provide uncertain effects against the Biodiversity SEA objective. This is given development may adversely impact upon habitats (and any associated species) present at the site, notably hedgerows, trees and dense scrub along site boundaries. Site F performs negatively given evidence indicates the presence of protected species (dormice) along the eastern boundary. Site E performs negatively as is currently in use as allotment space. Allotments are an increasingly important biodiversity resource, often providing excellent habitats for wildlife.

In terms of the Climate Change SEA objective, uncertain effects are anticipated for Site A given the surface water flood risk present at the site. All other sites are concluded as neutral given that impacts on greenhouse gas emissions are likely to be insignificant.

## Choice of sites taken forward for the SPNP

It is noted that Site A (West's Garage) and Site F (Land off Butterleigh Road) now have extant planning permission and therefore are no longer reasonable to consider as potential sites for allocation through the Neighbourhood Plan.

Of the remaining four sites, Silverton Parish Council seek to allocate the following for housing development through the Neighbourhood Plan:

- The Glebe (5 dwellings); and
- Tiverton Road (2 dwellings).

The Tiverton Road site, with a maximum yield of 2 dwellings, is supported by the local community and performed well in the Parish Council's Site Assessment, as set out in the Site Assessment and Allocation Report (2016).<sup>1</sup>

The Glebe is proposed for a small-scale residential development which will enable community access to the rest of the site for recreation purposes (an area of public open space of at least 0.5 ha - including the planting of native tree species and hedging to create a community woodland). The site is allocated for five dwellings.

## Assessment of the current version of the SPNP

The SPNP presents 22 planning policies for guiding development in the Neighbourhood Plan area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the SPNP. The Environmental Report has presented the findings of the assessment under eight SEA themes. These are as follows:

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<sup>1</sup> Silverton Parish (2016) Site Appraisal and Allocation Report



- |                         |                                   |
|-------------------------|-----------------------------------|
| – Biodiversity;         | – Land, soil and water resources; |
| – Climate change;       | – Population and community;       |
| – Landscape             | – Health and wellbeing; and       |
| – Historic environment; | – Transportation                  |

## Conclusions

The appraisal has highlighted that the plan as a whole is likely to lead to positive effects in relation to three SEA themes: 'Population and community'; 'Health and wellbeing' and 'Transportation'. Neutral effects are anticipated in relation to the 'Climate Change' and 'Landscape' SEA themes. Uncertain negative effects are anticipated in relation to the 'Biodiversity' and 'Historic Environment' SEA themes, while negative effects are anticipated in relation to the 'Land, Soil and Water resources' SEA theme.

The range of positive effects are anticipated in light of the SPNP's potential to deliver housing in appropriate locations to meet local needs; that new development will be required to contribute new or enhanced walking or cycling connectivity, and will likely connect positively with the village's green spaces; and that new development will be expected to avoid contributing to on-street parking and link well with the village core.

The plan includes a number of approaches that will contribute positively towards addressing the Climate Change SEA objective; i.e. recognising the role that retaining and enhancing green infrastructure can play in increasing resilience, particularly increased flood risk. However this is not seen to be significant in the context of the SEA process, and therefore residual neutral effects are anticipated.

Neutral effects are anticipated in relation to the 'Landscape' SEA theme as any impact on landscape character through the delivery of the site allocations is not likely to be significant. This is given the level of growth proposed and the location of sites adjacent to the settlement boundary. Additionally it is considered that mitigation will be provided through sensitive design and layout.

Uncertain minor negative effects are anticipated against the 'Historic Environment' SEA theme due to the sensitivity of the local historic environment and the potential for the Glebe site allocation to adversely impact upon the Silverton Conservation Area. It is however noted that given the scale of the site, any adverse effects are unlikely to be significant, and that the Neighbourhood Plan policies set out a range of provisions which are designed to conserve and enhance the fabric and setting of the historic environment. Any mitigation provided may result in a residual neutral effect.

Uncertain minor negative effects are anticipated against the 'Biodiversity' SEA theme because of the potential loss of habitat at the Tiverton Road development site. It is however considered that this can be suitably avoided and mitigated against if recommendations are adopted.

Significant negative effects are anticipated in relation to the 'Land, Soil and Water Resources' SEA theme, primarily in light of the fact that the allocation of the Glebe (and potentially Tiverton Road) will necessitate the loss of productive agricultural land with potential to be 'best and most versatile'.

## Recommendations

The following recommendation has been identified through the assessment of the SPNP:

- The Tiverton Road Development Sites (Policy HS04) could be revised to support habitat restoration and habitat re-creation at the site, in addition to an overall commitment to net-gain. This would contribute positively towards maintaining and enhancing the local biodiversity offer of Silverton Parish.

## Next steps

Subsequent to the current consultation on the Silverton Parish Neighbourhood Plan, the plan will be updated by the Parish Council to reflect comments received. This Environmental Report will be updated to reflect the changes made to the plan.

The Silverton Parish Neighbourhood Plan and this Environmental Report will then be submitted to Mid Devon District Council (MDDC) for its consideration. MDDC will consider whether the plan is suitable to go forward to Independent Examination in terms of the Silverton Parish Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan, and with due regard to the emerging Local Plan Review.

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

# 1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of Silverton Parish's emerging Neighbourhood Plan.
- 1.2 The Silverton Parish Neighbourhood Plan (SPNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Mid Devon Local Plan, with due regard to the emerging Local Plan Review.
- 1.3 It is currently anticipated that the SPNP will be submitted to Mid Devon District Council (MDDC) later in 2020.
- 1.4 Key information relating to the Silverton Parish Neighbourhood Plan is presented in **Table 1.1**.

**Table 1.1 Key facts relating to the Silverton Parish Neighbourhood Plan**

Name of Responsible Authority	Silverton Parish Council
Title of Plan	Silverton Parish Neighbourhood Plan (SPNP)
Subject	Neighbourhood planning
Purpose	<p>The SPNP 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 existing Mid Devon Local Plan.</p> <p>The SPNP will be used to guide and shape development within the Silverton Parish Neighbourhood Plan area.</p>
Timescale	To 2031
Area covered by the plan	The SPNP applies to the area that is under the jurisdiction of Silverton Parish Council ( <b>Figure 1.1</b> )
Summary of content	The SPNP sets out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point(s)	<p>William Croome</p> <p>Email address: <a href="mailto:su9448@eclipse.co.uk">su9448@eclipse.co.uk</a></p> <p>Elizabeth Trebble</p> <p>Email address: <a href="mailto:liz.trebble@live.co.uk">liz.trebble@live.co.uk</a></p>

## SEA explained

- 1.5 The SPNP has been screened in by MDDC as requiring a full SEA to be undertaken. The Screening Report (2018) identifies potential for significant environmental effects to occur from the implementation of the SPNP that were not considered and dealt with by the Sustainability Appraisal of the emerging Local Plan Review.<sup>2</sup> Specifically, these environmental effects relate to potential impacts on the setting of a church and conservation area arising from the inclusion of a potential site for housing at the Glebe, Silverton. The screening also states that the SEA process will need to demonstrate that all relevant considerations have been understood and used to inform any allocation at Tiverton Road, Silverton.
- 1.6 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 Silverton Parish Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.7 The SEA has been prepared in conformity 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) Directive<sup>3</sup>.
- 1.8 The SEA Regulations require that a report is published for consultation alongside the Pre-submission 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.

## Structure of this Environmental Report

- 1.9 In line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the Pre-submission plan which 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.<sup>4</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.10 More specifically, the Environmental Report must answer the following three questions:
  1. What has plan-making / SEA involved up to this point? – including in relation to 'reasonable alternatives'.
  2. What are the SEA findings at this stage? – i.e. in relation to the Pre-submission plan.
  3. What happens next?
- 1.11 This report essentially answers questions 1, 2 and 3 in turn, in order to provide the required information. Each question is answered within a discrete 'part' of the report. However, before answering question 1, two initial questions are answered in order to further set the scene, these are; what is the SPNP seeking to achieve; and what is the scope of the SEA?

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<sup>2</sup> Mid Devon District Council (2018) Silverton Neighbourhood Plan Strategic Environmental Assessment & Habitats Regulation Assessment Screening Report

<sup>3</sup> Directive 2001/42/EC

<sup>4</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

## 2. Local Plan context and vision for the Silverton Parish Neighbourhood Plan

### Local Plan context for the Silverton Parish Neighbourhood Plan

- 2.1 The SPNP is being prepared in the context of the existing Local Plan, which currently includes the Core Strategy (2007), the Allocations and Infrastructure Development Plan Document (2010) and Development Management Policies Document (2013).
- 2.2 The SPNP is also being prepared in the context of the emerging Mid Devon Local Plan Review. Consultation has recently been held (6 January – 17 February 2020) on Proposed Main Modifications to the Plan, following the Planning Inspector's Post-Hearings advice note published in May 2019.<sup>5</sup>
- 2.3 The emerging Local Plan Review will guide development in the district over a 20 year period and aims to ensure that new homes, jobs and services needed by communities are located in the most sustainable places. It will also help deliver the infrastructure, facilities and other developments needed to make this possible.
- 2.4 Neighbourhood Plans will form part of the development framework for Mid Devon, alongside the 'parent' document – the Local Plan. Neighbourhood Plans are required to be in general conformity with the strategic policies of the adopted 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 Mid Devon, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.5 The Local Plan Review includes 14 strategic policies. Three of these refer specifically to the main towns of the district where development will be focussed; Tiverton, Cullompton and Crediton. The other 11 provide the strategic context with which the SPNP must conform. Policy S13 (Villages) designates Silverton Parish as a 'village', suitable for a limited level of development, meeting local needs appropriate to its individual opportunities.
- 2.6 In line with Policy S13 *"development will be limited to proposals within their defined settlement limits and to allocations for:*
  - a) small-scale housing, employment, tourism and leisure;*
  - b) Services and facilities serving the locality; and*
  - c) Other limited development which enhances community vitality or meets a local social or economic need."*
- 2.7 In accordance with the strategic context of the Local Plan, Mid Devon District Council have confirmed a housing target of 13 dwellings for Silverton Parish. This reflects the findings of the local Housing Needs Survey (2016) which indicates that the majority preference, if development is to take place, is for small-scale developments of up to five houses.
- 2.8 The Local Plan Review document allocates two sites for housing within Silverton Parish:
  - 8 dwellings at Land at Old Butterleigh Road, Silverton (Policy SI1); and

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<sup>5</sup>Paul Griffiths (2020) Inspectors Post Hearings Advice Note [online] available at:  
<https://www.middevon.gov.uk/media/347312/id12-inspectors-mdlpr-post-hearings-advice-note.pdf>



- 5 dwellings at The Garage, Silverton (Policy SI2).
- 2.9 The two sites have since been consented for a total of 10 dwellings (5 dwellings at Land at Old Butterleigh Road and 5 dwellings at The Garage). This leaves a residual housing need of at least three dwellings.
- 2.10 The Parish Council seeks to allocate additional land for new housing through the SPNP to meet and exceed this residual need, to ensure development which best meets the objectives of the SPNP comes forward.

## Vision for the Silverton Parish Neighbourhood Plan

- 2.11 Developed during the earlier stages of the preparation of the plan by Silverton Parish Council, the vision for the Neighbourhood Plan is as follows:

*"Silverton is a rural Parish in the Exe Valley, yet within easy reach of Exeter and other local towns. We seek to protect the special character of both its country setting and ancient heritage, while encouraging the change and development needed to make our Parish a more thriving, more sustainable and safer place for the present community and for those who will live here in the future."*

- 2.12 The SPNP's vision is represented by the following set of topic-based themes (Table 2.1). The topics and themes were derived from consultation undertaken on the Neighbourhood Plan and an analysis of information provided.

**Table 2.1 SPNP topics and themes**

Topic	Theme
Natural environment	Enjoying and respecting the countryside and rural setting
Built environment	Being careful when making changes and additions to the built environment
Housing	Being willing and able to accommodate changing needs
Business and jobs	Maintaining a living and working parish
Traffic and travel	Reducing the impact of motor vehicles
Community spaces and activities	Creating a healthier and more active community and becoming more resilient and self-supporting

## 3. The scope of the SEA

### SEA Scoping Report

- 3.1 The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, the Environment Agency and Historic England<sup>6</sup>. These authorities were consulted on the scope of the Silverton Parish Neighbourhood Plan SEA in March 2019.
- 3.2 The purpose of scoping was to outline the 'scope' of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
  - Baseline data against which the Neighbourhood Plan can be assessed;
  - The key sustainability issues for the Neighbourhood Plan; and
  - An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in [Appendix A](#).
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in [Table 3.1](#)

**Table 3.1 Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Natural England</b>	
<i>Victoria Kirkham, Consultations Team (email response received on 29th April 2019)</i>	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Comment noted.
<b>Historic England</b>	
<i>David Stuart   Historic Places Adviser South West (email response received on 13th May 2019)</i>	
It would be helpful to identify at the beginning of the Report the reasons why the Screening Opinion identified the need for a full SEA (a point we have made to AECOM previously). This can help ensure that relevant issues are investigated to an appropriate level of depth and understanding.	Comment noted. Reasons for positive SEA screening opinion set out at Section 1.5 of this Environmental Report.
The Historic Environment section of the Report refers to "historic" assets. This should be "heritage assets" in accordance with statutory nomenclature.	Comment noted. References to "historic" assets updated to "heritage" assets.
<b>Environment Agency</b>	
No comments received.	N/A

<sup>6</sup> 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 planning and programmes'.

## Key sustainability issues

- 3.5 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 the nine SEA themes

### Air quality

- 3.6 Air quality in the Neighbourhood Plan area is good, with no significant issues identified.
- 3.7 There are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan, with the nearest being located in Cullompton, approximately 7.5km north east of Silverton Parish.
- 3.8 Housing and employment growth have the potential to increase emissions and reduce air quality in the area.
- 3.9 Due to the absence of any significant air quality issues within the Neighbourhood Plan area, air quality has been scoped out for the purposes of the SEA process.

### Biodiversity

- 3.10 There are no internationally or nationally designated sites within Silverton Parish, however Killerton Site of Special Scientific Interest (SSSI) is located within 100m of the Neighbourhood Plan area, to the south.
- 3.11 There are a number of locally designated sites within Silverton Parish, including County Wildlife Sites (CWS), Unconfirmed Wildlife Sites (UWS) and Other Sites of Wildlife Interest (OSWI).
- 3.12 The Neighbourhood Plan area includes BAP (Biodiversity Action Plan) priority habitats and other features of biodiversity value such as trees, hedgerows, and woodland. Their integrity should also be supported through improved ecological connections in the area, including through the provision of green infrastructure enhancements.

### Climate change

- 3.13 Flood risk in Silverton has the potential to increase as a result of development, land use change and climate change.
- 3.14 Per capita greenhouse gas emissions for Mid Devon District are slightly higher than England's average, but have been falling since 2005.
- 3.15 An increase in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions.
- 3.16 There is a need to increase the Neighbourhood Plan area's resilience to the effects of climate change through supporting adaptation to the risks associated with climate change in the area.

### Historic environment

- 3.17 The Neighbourhood Plan area has a rich historic environment with many designated and non-designated heritage assets that new development would need to positively respond to; including 61 listed buildings and Silverton Conservation Area.
- 3.18 Silverton Conservation Area has a varied character, ranging from the green nature of the Church and Berry to the busy environment of The Square.
- 3.19 Development has the potential to positively affect the setting of designated heritage assets through townscape/ public realm improvements, and may also increase access to and awareness of heritage assets.

## Landscape

- 3.20 Silverton Parish comprises three main landscape character types, as identified through the Mid Devon Landscape Character Assessment (LCA) 2011. The ancient woodlands and copses, mature trees, hedgerows and Devon banks are all noted in the LCA as being major contributory factors to the distinct special quality of the area and worthy of protection and/or enhancement.
- 3.21 Silverton Conservation Area forms the core of the village, contributing to the landscape and townscape character and quality. The Conservation Area holds valued views of the surrounding countryside including the Exe and Culm Valley.

## Land, soil and water resources

- 3.22 Land classified as the Best and Most Versatile Agricultural Land is present in parts of the Neighbourhood Plan area.

## Population and communities

- 3.23 Based on the most recent Census data available, the population of the Neighbourhood Plan Area increased by 4.05% between 2001 and 2011.
- 3.24 There is a greater proportion of residents aged 60+ within the Neighbourhood Plan area, compared to regional and national totals, indicating an ageing population.
- 3.25 Households in the Neighbourhood Plan area are relatively less deprived in comparison to District, regional and national averages.
- 3.26 The majority of residents within the Neighbourhood Plan area own a household either outright or by mortgage, a higher rate than the District, regional and national averages.
- 3.27 The average house prices within the Silverton Parish are higher than the District averages.
- 3.28 There is a high proportion of highly qualified and skilled residents within the Neighbourhood Plan area.

## Health and wellbeing

- 3.29 The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health'. This is higher than District, region, and national totals.
- 3.30 A greater percentage of residents in the Neighbourhood Plan area report that their activities are not limited by disability, compared to District, regional and national percentages.
- 3.31 Local evidence suggests green spaces are limited in both Silverton village and Ellerhayes hamlet.

## Transportation

- 3.32 The Neighbourhood Plan area does not have a railway station.
- 3.33 The proportion of people driving a car or van to work is slightly higher in the Neighbourhood Plan area than Mid Devon, regional and national averages.
- 3.34 Buses to and from Silverton are supplied by Stagecoach and run in a circular route from Exeter to Tiverton. Services are frequent and stop both in The Square and at Silverton CoE Primary School on the edge of the settlement
- 3.35 The Public Rights of Way (PRoW) network is an important asset for residents and is well utilised, providing a green link between lanes and roads.

3.36 All exits from the village are constrained and road conditions are poor. Road safety is a concern in places.

## SEA Framework

3.37 The 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 SPNP is presented below, excluding the air quality SEA theme which has been scoped out due to the absence of any significant issues.

**Table 3.2: SEA Framework for the SPNP**

SEA Objective	Assessment questions
<b>Biodiversity</b>	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Protect and enhance semi-natural habitats?</li> <li>• Protect and enhance locally designated sites?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to ecological networks, including through improvements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity?</li> </ul>
<b>Climate change</b>	
Promote climate change mitigation in Silverton Parish	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Limit the increase in the carbon footprint of the plan area from population growth?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Reduce the need to travel?</li> <li>• Increase the number of new developments meeting sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
Support the resilience of Silverton Parish to the potential effects of climate change	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that no development takes place in areas at higher risk of flooding, taking into account the likely effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the plan area?</li> <li>• Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?</li> </ul>
<b>Historic environment</b>	



SEA Objective	Assessment questions
Protect, maintain and enhance the rich historic environment within and surrounding the Neighbourhood Plan area, including Silverton Conservation Area, further designated and non-designated heritage assets and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the Silverton Conservation Area?</li> <li>• Conserve and enhance listed and locally listed buildings, and their settings, within and surrounding the Neighbourhood Plan area?</li> <li>• Conserve and enhance Silverton's local identity and distinctiveness?</li> <li>• Support access to, interpretation and understanding of the historic environment?</li> </ul>
<b>Landscape</b>	
Protect and enhance the character and quality of landscapes and villagescapes within and surrounding the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance landscape character and features?</li> <li>• Conserve and enhance villagescape character and features?</li> <li>• Support the integrity of the Silverton Conservation Area?</li> </ul>
<b>Land, soil and water resources</b>	
Ensure the efficient and effective use of land	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid development of the best and most versatile agricultural land (Grades 2 and 3a land)?</li> </ul>
Use and manage water resources in a sustainable manner	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> <li>• Ensure the timely provision of wastewater infrastructure?</li> <li>• Protect groundwater resources?</li> </ul>
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"> <li>• Limit the amount of waste produced and support the minimisation, reuse and recycling of waste?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> </ul>
<b>Population and community</b>	
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"> <li>• Promote the development of a range of high quality, accessible community facilities?</li> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> </ul>

SEA Objective	Assessment questions
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>
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"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>
<b>Health and wellbeing</b>	
Improve the health and wellbeing of residents within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Facilitate enhancements to the housing stock of the Neighbourhood Plan area?</li> <li>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>• Reduce noise pollution?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreation?</li> </ul>
<b>Transportation</b>	
Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the need to travel through sustainable patterns of land use and development?</li> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> </ul>

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

### Introduction

- 4.1 In accordance with the SEA Regulations, the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 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 Regulation 14 version of the Silverton Parish Neighbourhood Plan has been informed by an assessment of alternative locations for non-strategic scale development in the Neighbourhood Plan area.

### Overview of plan-making / SEA work undertaken to date

- 4.3 Plan-making for the SPNP has been underway since 2015. Initial work incorporated a number of informal and formal consultation exercises carried out by the Parish Council including on the scope of the Neighbourhood Plan.
- 4.4 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.
- 4.5 The following sections discuss the evolution of the SPNP in association with the SEA process.

### Assessment of reasonable alternatives for the SPNP

- 4.6 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the SPNP. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the *'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'*.
- 4.7 Alternative approaches have been considered in relation to the location of housing to be delivered.

### Assessment of housing sites for allocation through the SPNP

- 4.8 In support of the development of the Silverton Neighbourhood Plan, a local Housing Needs Survey was undertaken in February 2016, which identified a significant local need for affordable housing.<sup>7</sup> However it is recognised that the main responsibility for ensuring housing needs are met rests with the local planning authority. Mid Devon District Council has therefore confirmed that there is no obligation on the Parish Council to use the Neighbourhood Plan to meet the local need for affordable housing either in full or part within the Silverton Neighbourhood Plan area. Housing opportunities in nearby areas and the overall policies for affordable housing

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<sup>7</sup> Silverton Housing Needs Survey (2016)

- provision being pursued by the District Council in different parts of the district can be taken into account, and as such Silverton Parish should not be treated as an isolated housing market.
- 4.9 As discussed in [Section 2.1](#), the Neighbourhood Plan has been prepared in conjunction with the provisions of the existing Local Plan and the emerging Mid Devon Local Plan Review.
- 4.10 In accordance with the strategic context of the Local Plan, Mid Devon District Council have confirmed a housing target of 13 dwellings for Silverton Parish. Additionally, the local Housing Needs Survey (2016) indicates that the majority preference, if development is to take place, is for small-scale developments of up to five houses.
- 4.11 The Local Plan Review document allocates two sites for housing within Silverton Parish:
- 8 dwellings at Land at Old Butterleigh Road, Silverton (Policy SI1); and
  - 5 dwellings at The Garage, Silverton (Policy SI2).
- 4.12 Both sites have since been consented for a total of 10 dwellings (5 dwellings at Land at Old Butterleigh Road and 5 dwellings at The Garage). This leaves a residual housing need of at least three dwellings.
- 4.13 In June 2020 outline planning was granted on appeal for up to 20 dwellings on the field north of Applemead/ Silverdale. The application drew a large number of objections from the local community, as it does not align with the objectives of the Neighbourhood Plan. Notably, the Neighbourhood Plan seeks to steer away from larger development, and prioritise small development (maximum five dwellings).
- 4.14 While the housing target for the area is now being met and exceeded by the Applemead/ Silverdale site, the Parish Council nonetheless seeks to allocate additional land for new housing through the SPNP. This is with the aim of delivering future housing development that is appropriately small in scale so as not to have an adverse effect on the visual amenity and essential infrastructure of the area.
- 4.15 In order to explore potential site options for allocation the Parish Council firstly looked to the SHLAA (2014), and subsequently put out a Call for Sites (CfS) to local landowners (2016). Using the SHLAA and the response to the local CfS, six areas of land in and around the village of Silverton were identified as potential locations for housing allocations to be taken forward for the purposes of the Neighbourhood Plan. The locations of these sites are presented in [Figure 4.1](#).
- 4.16 To support the consideration of the suitability of these sites, the SEA process has undertaken an appraisal of the key environmental constraints present at each of the six sites and potential effects that may arise as a result of housing development at these locations. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping ([Section 3.3](#)) and the baseline information.
- 4.17 The tables below present the findings of this appraisal, and provide an indication of each site's sustainability performance in relation to the eight SEA themes.

Drawing Number	Rev
<b>FIGURE 4.1</b>	<b>01</b>



**Table 4.1: Site A, Wests Garage**

<b>Site size: 0.11 ha</b>	
<b>Biodiversity</b>	<p>The site is not within or adjacent to any biodiversity designations.</p> <p>The site itself is previously developed; the site was in use as a garage however the business is now closed. There is little open/ green space present. However the site does hold a level of biodiversity value through the vegetation lining the site boundary. Nonetheless, development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.</p>
<b>Climate change</b>	<p>In terms of climate change mitigation, development of the site is likely to increase the built footprint of the village due to an intensification of the site. However impacts on greenhouse gas emissions are likely to be insignificant.</p> <p>In terms of climate change adaptation, there are no areas of fluvial flood risk at the site though an area of surface water flood risk is located adjacent to the site, to the west. It may be necessary for future development to adopt a layout which has regard for this.</p>
<b>Historic environment</b>	<p>The site is 100m southwest of the Silverton Conservation Area, though its setting is considered to be limited by established planted screening including trees and hedgerows. As such, it is considered unlikely that development would lead to residual significant adverse effects in this respect.</p> <p>In terms of the Devon and Dartmoor Historic Environment Record (HER), 'Crosses or Warrens' is located north east of the site. 'Crosses or Warrens' includes a former farmstead, with a house and other buildings on the north side of the road, and a large barn and yard on the south side of the road, shown on mid-19th century map. This was replaced by a new farmstead called Channon's by the late 19th century. Development of this brownfield site offers the potential to deliver enhancements to the quality of the built environment which benefits the setting of the historic environment, if high quality design and layout are incorporated within new development. Nonetheless, given the presence of the historic asset in close proximity to the site, residual effects are currently uncertain.</p>
<b>Landscape</b>	<p>There are no significant landscape constraints present at this small brownfield site, although the site does occupy a prominent position at the southwestern approach to the village and as such could be sensitive to inappropriate development in villagescape terms. However there is a high level of vegetative screening surrounding the site, notably along the roadside, limiting views in to and out of the site. Additionally, the current uses on site appears to be of low quality and offers little to the village's street scene. Therefore there could be an opportunity to enhance villagescape quality through redevelopment.</p>
<b>Land, soil and water resources</b>	<p>The site is previously developed so new development would not necessitate the loss of any agricultural land. In the context of the plan area this is a notable positive, and would represent an efficient use of soils resources through directing development away from areas of the best and most versatile land.</p>
<b>Population and community</b>	<p>Development of the site will contribute positively towards the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is located on the southern edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community.</p> <p>Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.</p>

<b>Health and wellbeing</b>	The site is 0.6km from the nearest health facilities (Wyndham House Surgery) in Silverton, and 0.6 km from the wider service offer in the village centre. The recreational ground on Coach Road is a similar distance from the site, offering opportunities for residents to engage in physical activities. Public footpaths from the site are notably limited, with access to the village centre via Newcourt Road, which may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.	
<b>Transport</b>	The site is a reasonable walking distance from the village centre, along Newcourt Road, however there are no pedestrian footpaths on this road and it is narrow in places. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely. The site also holds vehicle access constraints.	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

**Table 4.2: Site B, Tiverton Road**

<b>Site size: 0.07 ha</b>	
<b>Biodiversity</b>	<p>The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is greenfield predominately made up of scrub grassland, with sparse hedges and trees along the site boundary. Development may adversely impact these habitats and any associated species either directly through habitat loss or indirectly through disturbance.</p> <p>It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.</p>
<b>Climate change</b>	<p>In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk. The site is within walking distance of the limited services offered within the village, though this would be via Tiverton Road which does not have a footpath. A continued high level of car dependence for accessing a wider range of services and facilities at nearby towns/ larger settlements is anticipated. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.</p>
<b>Historic environment</b>	<p>The site is not located within the Silverton Conservation Area, and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.</p>
<b>Landscape</b>	<p>There are no significant landscape constraints at the site, and the site is notably well-screened by mature trees on three sides. The site is located adjacent to existing development on Applemead and on the other side of Tiverton Road. While the site is elevated in part, any impact on local landscape setting is likely to be limited and it is considered unlikely that development would have a significant detrimental effect on landscape character.</p>
<b>Land, soil and water resources</b>	<p>It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 2. Development therefore has the potential to lead to a loss of best and most versatile agricultural land.</p>
<b>Population and community</b>	<p>Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is located on the north west edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community.</p> <p>Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.</p>
<b>Health and wellbeing</b>	<p>The site is 0.5km from the nearest health facilities (Wyndham House Surgery) in Silverton, and 0.3 km from the wider service offer in the village centre. The recreational ground on Coach Road is 0.5km from the site, offering potential for residents to engage in physical activities. Public footpaths from the site are notably limited. Access to the village centre via Tiverton Road, which may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.</p>

Transport	The site has good vehicular access on to Tiverton road, though this is notably congested due to its direction towards the A396, a main route for travel to and from the village. The site is within good walking distance of the village centre, via Tiverton Road which may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely. The site also holds vehicle access constraints.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

**Table 4.3: Site C, Roosters**

<b>Site size: 0.25 ha</b>	
<b>Biodiversity</b>	<p>The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is predominately brownfield, including Babylon farmhouse and Roosters bungalow. Hedges and mature trees are present along the site boundary, notably along Babylon Lane and adjacent to the chicken sheds. Development may adversely impact these habitats and any associated species either directly through habitat loss or indirectly through disturbance.</p> <p>It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.</p>
<b>Climate change</b>	<p>In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk. The site is distant from the village centre and development is likely to lead to continued high level of car dependence for accessing both local and wider services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.</p>
<b>Historic environment</b>	<p>The site is not located within the Silverton Conservation Area, and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.</p>
<b>Landscape</b>	<p>The site is isolated from the existing settlement, located approx. 1.6km from the built up urban area, in the open countryside. The site exists within a rural, agricultural setting, bordered on all sides by farmland. Residential development at the site therefore would not be in-keeping with the existing surrounding uses, with the potential to alter the character of the landscape. However given the site is brownfield, and small in size, effects are likely to be limited and localised. Additionally, it is noted that views in and out of the site are limited by partial vegetative screening from hedgerows and trees, and rising land to the south east side.</p> <p>Given the current use of the site there could be an opportunity to enhance local landscape quality through redevelopment. However, overall minor negative effects are anticipated given the nature of the site in the open countryside away from the existing settlement.</p>
<b>Land, soil and water resources</b>	<p>The site is previously developed so new development would not necessitate the loss of any agricultural land. In the context of the plan area this is a notable positive, and would represent an efficient use of resources in terms of directing development away from land classified as the best and most versatile land.</p>
<b>Population and community</b>	<p>Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is isolated from the existing settlement, located approx. 1.6km from the built up urban area. Development is unlikely to integrate positively with the local community.</p> <p>Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing, and distance of the site from the existing settlement.</p>



Health and wellbeing	The site is approx. 1.6km from local services in the village centre, including health facilities at Wyndham House Surgery and opportunities for recreation/ sport. Additionally, this route is narrow in places and may not be particularly safe for pedestrians as it does not have a footpath. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.	
Transport	The site is approx. 1.6km from local services in the village centre and there are no accessible footpaths close by. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.	
Key		
Likely adverse effect (without mitigation measures)	Likely positive effect	
Neutral/no effect	Uncertain effects	

**Table 4.4: Site D, The Glebe**

<b>Site size: 0.79 ha</b>	
<b>Biodiversity</b>	<p>The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is greenfield with vegetation (hedgerows and trees) lining the site boundaries. This is notably dense along the south, coinciding with an area of Priority Habitat Inventory 'No main habitat but additional habitat exists' located adjacent to the site. Development has the potential to adversely impact these habitats and any associated species either directly through habitat loss or indirectly through disturbance.</p> <p>It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.</p>
<b>Climate change</b>	<p>In terms of climate change adaptation the site is not directly affected by fluvial flood risk, though an area of surface water flood risk is located adjacent to the site, along the southern boundary. It may be necessary for future development to adopt a layout which has regard for this. The site is walking distance to the service offer within the village, supporting active travel locally. However a continued high level of car dependence is anticipated for accessing a wider range of services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.</p>
<b>Historic environment</b>	<p>The site is located on the edge of the historic core of the village, partly within the Silverton Conservation Area (the northern part of the site closest to the settlement). Archaeological mitigation may be required in order to prevent damage to the remnants of 19<sup>th</sup> century buildings which are highly concentrated in the centre of the Conservation Area. Investigation into the potential for heritage assets to be present on site may be necessary.</p> <p>The Conservation Area appraisal states that there are long distance/ panoramic views out of the site from Church Road and just off Newcourt Road at the north of the site. Specifically, <i>"open swathes of farmland can be viewed to the south of Newcourt Road although some of these views are only visible through gaps in the tall hedge banks."</i> The Conservation Area Appraisal also highlights that the church tower of St Mary the Virgin (Grade I Listed) can be seen from the entire Conservation Area (therefore including part of the site). Development at the site therefore has the potential to impact upon the setting of this significant landmark in Silverton and the surrounding countryside. Development also has the potential to impact upon the wider Conservation Area, its intrinsic qualities and setting. Notably in this respect, the Devon and Dartmoor Historic Environment Record (HER) identifies 'Orchard Banks South of Silverton' covering the site. The HER indicates that the earthwork banks fell within the area of a former orchard potentially of post medieval to 20th century date.</p>
<b>Landscape</b>	<p>The site is located at the edge of the settlement and overlooked by several residences. The site is elevated and fairly open despite broken borders of hedges and mature trees, offering rural countryside views towards the south.</p> <p>Development would be a natural extension to the current built up part of the village, however would have the potential to change the existing rural character to the south, and may impact upon the local villagescape. Given the size of the site significant effects are not anticipated, with residual impact dependant on detailed design and layout.</p> <p>It is noted that the land was considered by MDDC in the 2013 'call for sites' process and was withdrawn due to the environmental and high visual impact.</p>

Land, soil and water resources	This greenfield site is currently in use for agriculture (pasture). It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 2. Development therefore has the potential to lead to a loss of best and most versatile agricultural land.	
Population and community	Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The small size of the site would likely make it challenging to deliver a considerable number of affordable housing or a mix of housing types and tenures. The site is located on the southern edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community. Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.	
Health and wellbeing	The site has good access to the village centre (approx. 200 meters), supporting healthy modes of travel, and providing access to open spaces for leisure, such as the recreational grounds on Coach Road. The site is also 500m from the local doctor's surgery via Newcourt and School Road. Given the rural nature of the village, a continued high level of car dependence for accessing a wider range of services and facilities at larger settlements/ towns is anticipated. However, overall, development is likely to have positive effects for the health and wellbeing of residents.	
Transport	The site has good access to local services in the village centre, with paths crossing the Berry and the Churchyard to School Road; supporting active travel locally. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for access to wider services in neighbouring centres is likely.	
Key		
Likely adverse effect (without mitigation measures)	Likely positive effect	
Neutral/no effect	Uncertain effects	

**Table 4.5: Site E, Hillcrest**

<b>Site size: 0.05 ha</b>	
<b>Biodiversity</b>	The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is formerly surplus garden land to the rear of three bungalows, which has more recently been cultivated for private allotment space. Allotments are an increasingly important biodiversity resource, often providing excellent habitats for wildlife. <sup>8</sup> Development of the site is therefore likely to lead to negative effects, adversely impacting habitats and associated species through permanent loss or disturbance.
<b>Climate change</b>	In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk. The site is within walking distance to the services offered within the village, supporting active travel locally. However a continued high level of car dependence is anticipated for accessing a wider range of services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.
<b>Historic environment</b>	The site is not located within the Silverton Conservation Area, and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.
<b>Landscape</b>	This village site is small in size, previously in use as surplus garden land to the rear of several bungalows, now turned allotment space. As such, residential development would likely be seen as infill, in keeping with the existing built form. However, development will likely impacts on villagescape character as it will lead to the loss of open land in the middle of the village.
<b>Land, soil and water resources</b>	This greenfield site is previously garden and currently in use as allotment space. It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3, which may be Grade 3a (which is best and most versatile) or 3b (which is not). It is therefore uncertain at this stage whether development would lead to a loss of best and most versatile agricultural land. Given the existing land use is allotment space, development on the site will inevitably lead to the loss of productive land, with the potential for adverse effects. However, the significance of any impact would likely be negligible given the size of the site and subsequent very limited loss of land.
<b>Population and community</b>	Development of the site will contribute positively towards the meeting local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it extremely challenging to deliver affordable housing or a mix of housing types and tenures. The site is located to the north east of the village of Silverton and adjacent to existing residential dwellings. Development would likely integrate positively with the local community.  Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.

<sup>8</sup> Natural England (2007) Wildlife on allotments [online] available at: <https://enablelc.org/wp-content/uploads/2016/03/wildlifeonallotments.pdf>

Health and wellbeing	<p>The site has good access to the village centre (approx. 500m), supporting healthy modes of travel, and providing access to open spaces for leisure, such as the recreational grounds on Coach Road. The site itself is currently a single allotment, which provides a place for exercise, and opportunities for socialising; supporting community engagement and the overall wellbeing of residents. Residential development at the site would therefore lead to negative effects against this SEA theme due to the loss of this community resource.</p> <p>In terms of access to health services, the site is 500m from the local doctor's surgery via Wyndham Road. Given the rural nature of the village, a continued high level of car dependence for accessing a wider range of services and facilities at towns/ larger settlements is anticipated.</p> <p>Overall, development is likely to lead to negative effects given the loss of the allotment space.</p>
Transport	<p>The site has good access to local services in the village centre, supporting active travel locally, and there are public footpaths extending along the site boundary connecting with local services such as the C of E Primary School.</p> <p>The site is within 100m of a local bus stop, however services are notably limited. A continued reliance on the car for access to wider services in neighbouring centres is likely.</p> <p>A key constraint for this site is access. The site has no secure vehicular access given a recently built house (11a) controls access from the public highway and a further plot of land, owned by a third party, intervenes. With the co-operation of the adjoining owners, access could be achieved to enable development, however this is uncertain at this stage.</p>
Key	
Likely adverse effect (without mitigation measures)	Likely positive effect
Neutral/no effect	Uncertain effects

**Table 4.6: Site F, Old Butterleigh Road**

<b>Site size: 0.41 ha</b>	
<b>Biodiversity</b>	<p>The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is greenfield predominately made up of scrub grassland, with hedges and trees along the site edges and lining the site boundary. An ecology survey has been carried out by Ecological Surveys Ltd which found evidence of dormice along the eastern boundary. Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended.</p> <p>Development at the site therefore has the potential to adversely impact habitats present and associated species, including protected species, either directly through habitat loss or indirectly through disturbance.</p> <p>It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.</p> <p>Overall given the presence of protected species at the site, negative effects are anticipated at this stage.</p>
<b>Climate change</b>	<p>In terms of climate change adaptation, there is a small area of Flood Zone 2 and 3 located along the eastern boundary of the site, coinciding with a small watercourse. This area of the site is also at risk of surface water flooding. It is likely that future development will be required to adopt a layout which has regard for this, avoiding the high flood risk area. The site is walking distance to the limited service offer within the village, supporting active travel locally. However, a continued high level of car dependence is anticipated for accessing a wider range of services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant..</p>
<b>Historic environment</b>	<p>The eastern boundary of the site abuts the Silverton Conservation Area, with the potential for development to lead to adverse effects on its setting. However the Conservation Area Management Plan does not identify the site as holding any notable views or features, and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.</p>
<b>Landscape</b>	<p>The greenfield site borders the main village settlement to the south, located between existing residential dwellings stretching along Old Butterleigh Road. Development at the site would therefore be in keeping with the existing ribbon development seen, providing a natural extension to the existing built form up the valley. Additionally, the site is bounded by hedge-banks and trees and has minimal sightlines into the area, reducing the potential for any adverse effects on landscape character/ setting.</p>
<b>Land, soil and water resources</b>	<p>Agricultural Land Classification carried out for the site indicates that almost half the site is Grade 2 and half is Grade 3 agricultural land. While it is uncertain whether this is Grade 3a (which is best and most versatile) or Grade 3b (which is not), given the presence of Grade 2 land, development would likely result in the loss of high quality agricultural land .</p>



<b>Population and community</b>	<p>Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is located on the northern edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community.</p> <p>Overall, the contribution to housing need is considered positive despite the limited opportunity for delivering affordable housing.</p>	
<b>Health and wellbeing</b>	<p>Due to its position on the edge of the settlement along Old Butterleigh Road, the site has good access to key community services in the north/ centre of the village such as the doctor's surgery (0.5km from the site). This supports healthy modes of travel, providing access to open spaces for leisure, such as the recreational grounds on Coach Road.</p> <p>Given the rural nature of the village, a continued high level of car dependence for accessing a wider range of services and facilities at nearby towns/ larger settlements is anticipated. However, overall, development is likely to have positive effects for the health and wellbeing of residents.</p>	
<b>Transport</b>	<p>The site is well located in terms of access to services in the village centre, supporting active travel locally, however there are no public footpaths from the site. Access to the village centre would be via Old Butterleigh Road, High Street and Fore Street. Notably Old Butterleigh Road is narrow in places and may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.</p>	
<b>Key</b>		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

## Summary of SEA site findings

4.18 The following table presents a summary of the findings of the SEA assessment of the potential site options.

**Table 4.7 Summary of SEA site appraisal findings**

Site	Biodiversity	Climate change	Historic env	Landscape	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Site A								
Site B								
Site C								
Site D								
Site E								
Site F								

4.19 Site A followed by Site B is best performing against the SEA objectives, with Sites C and E being the least well performing options. All sites performed positively against the Population and community SEA Objectives given they will contribute positively towards meeting local housing need, however it is recognised that Site C is isolated from the existing settlement. Sites differ in performance against all other SEA Objectives. Taking each in turn:

4.20 Positive effects are predicted for Site D and F against Health and Wellbeing as these sites are located adjacent to the village centre, supporting healthy modes of travel for local services, facilities and recreation. Neutral effects are predicted for Sites A and B as these sites are within approx. 10 min walking distance of village services, however the safety of these roads for pedestrians are a concern locally. Sites C and E perform negatively given the distance of the site from the village centre, and the potential loss of community allotment space, respectively. Negative effects are therefore also anticipated for Site C against the Transportation Objective.

4.21 Sites A and E also perform negatively against the Transportation SEA Objective due to unconfirmed vehicle access at these sites. All other sites are concluded uncertain due to the safety and accessibility points discussed above (in addition to the absence of sustainable travel options).

4.22 Sites B, D, E and F perform negatively against the Land, Soil and Water SEA Objective given the likely loss of BMV agricultural land and (in terms of Site E) productive allotment land. Effects are uncertain for Site E in this respect, and likely to be negligible overall given the size of the site and subsequent very limited loss of land. Sites A and C perform positively given they are brownfield sites and would be directing development away from BMV land.

4.23 In terms of Landscape, Sites A and B perform positively given they are small, well screened, brownfield sites. Neutral effects are anticipated for Site F given its location nestled between existing development and vegetative screening present. Effects are uncertain for Site E as while a small infill site in the village, localised effects on townscape may result. Site C performs least well in this respect, given its location in the open countryside away from the existing settlement.

- 4.24 Site D performs negatively against the Historic Environment objective given the site is partially within the Silverton Conservation Area, and potential effects on long distance views and the setting of church tower of St Mary the Virgin (Grade I Listed) as set out in the Silverton Conservation Area Appraisal. Sites A and F also have the potential to impact upon the Conservation Area, however effects are currently uncertain at this stage. Additionally, development of this brownfield site offers the potential to deliver enhancements to the quality of the built environment which benefits the setting of the historic environment, if high quality design and layout are incorporated within new development. Neutral effects are anticipated for Sites B, C, and E given that no historic environment designations are present in the setting of the sites.
- 4.25 All sites with the exception of Sites E and F are uncertain against the Biodiversity SEA objective given development may adversely impact upon habitats (and any associated species) present at the site, notably hedgerows, trees and dense scrub along site boundaries. Site F performs negatively given evidence indicates the presence of protected species (dormice) along the eastern boundary. Site E performs negatively as is currently in use as allotment space. Allotments are an increasingly important biodiversity resource, often providing excellent habitats for wildlife.
- 4.26 In terms of the Climate Change SEA objective, uncertain effects are anticipated for Site A given the surface water flood risk present at the site. All other sites are concluded as neutral given that impacts on greenhouse gas emissions are likely to be insignificant.

## Choice of sites taken forward for the SPNP

- 4.27 It is noted that Site A (West's Garage) and Site F (Land off Butterleigh Road) now have extant planning permission and therefore are no longer reasonable to consider as potential sites for allocation through the Neighbourhood Plan.
- 4.28 Of the remaining four sites, Silverton Parish Council seek to allocate the following for housing development through the Neighbourhood Plan:
- The Glebe (5 dwellings); and
  - Tiverton Road (2 dwellings).
- 4.29 The Tiverton Road site, with a maximum yield of 2 dwellings, is supported by the local community and performed well in the Parish Council's Site Assessment, as set out in the Site Assessment and Allocation Report (2016).<sup>9</sup>
- 4.30 The Glebe is proposed for a small-scale residential development which will enable community access to the rest of the site for recreation purposes (an area of public open space of at least 0.5 ha - including the planting of native tree species and hedging to create a community woodland). As such the site is allocated for five dwellings.

## Neighbourhood Plan policies

- 4.31 To support the implementation of the vision for the Neighbourhood Plan discussed in [Chapter 2](#), the SPNP puts forward 22 policies to guide development in the Neighbourhood Plan area. Policies have been identified in relation to the Neighbourhood Plan objectives, following extensive community consultation and evidence gathering. The policies are set out in [Table 4.8](#) overleaf.

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<sup>9</sup> Silverton Parish (2016) Site Appraisal and Allocation Report

**Table 4.8: SPNP policies**

### Natural Environment

<b>EN01</b>	Retaining and Enhancing the Natural Environment
<b>EN02</b>	Rights of Way (Public Footpaths, Bridleways and Cycleways)
<b>EN03</b>	Local Green Space
<b>EN04</b>	Minimising Flood Risk

### Built Environment

<b>BE01</b>	Local Character and Design Standards
<b>BE02</b>	Local Heritage

### Housing

<b>HS01</b>	Scale of Housing Development
<b>HS02</b>	Meeting Local Housing Need
<b>HS03</b>	The Glebe Housing Development Site
<b>HS04</b>	Tiverton Road Development Site
<b>HS05</b>	Community Housing
<b>HS06</b>	Parking Spaces on Housing Developments

### Business and Jobs

<b>BJ01</b>	Roosters, Babylon Road Employment Site
<b>BJ02</b>	Super-fast Connectivity
<b>BJ03</b>	Home Working

### Traffic and Travel

<b>TR01</b>	Non-Car Travel
<b>TR02</b>	Pedestrian Link to Main Road
<b>TR03</b>	Traffic Management
<b>TR04</b>	Off Road Parking

### Community Spaces and Activities

<b>CS01</b>	Existing Community Facilities and Assets
<b>CS02</b>	Existing Recreation Spaces
<b>CS03</b>	New Public Open Space

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

### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Pre-submission version of the SPNP. This chapter presents:
- An appraisal of the current version of the SPNP under the eight SEA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.
- 5.2 The appraisal is structured under the eight 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.<sup>10</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.3 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### Biodiversity

- 5.4 There are no internationally or nationally designated sites within Silverton Parish. However Killerton Site of Special Scientific Interest (SSSI) is located within 100m of the Neighbourhood Plan area, to the south. The Neighbourhood Plan area does not fall within a SSSI Impact Risk Zone (IRZ) for residential development, rural residential development or rural non-residential development relating to this site. It is therefore not considered that the SPNP will lead to adverse effects on nationally designated sites.
- 5.5 The Neighbourhood Plan area contains locally designated sites and a variety of BAP Priority Habitats and Species. Ancient woodlands and copses, mature trees, hedgerows and Devon banks are all noted in the LCA (2011) as being major contributory factors to the distinct special quality of the area.<sup>11</sup> The SPNP therefore sets out a range of provisions to help limit potential effects of new development on features and areas of biodiversity interest in the Neighbourhood Plan area, and supports enhancements where possible. Specifically, Policy EN01 (Retaining and Enhancing the Natural Beauty of our Parish) states that *"where changes to existing traditional Devon banks is unavoidable, proposals for development which affect traditional Devon hedges will only be supported where they have demonstrated that options have been assessed and, as a result, have proposed the least damaging option (to the hedgerow / bank, setting in the landscape, biodiversity and habitats)."*
- 5.6 The National Planning Policy Framework (NPPF) (2019) states that planning policies and decisions should contribute to and enhance the natural and local environment by *"minimising*

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<sup>10</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>11</sup> Mid Devon District Council (2011) Mid Devon Landscape Character Assessment [online] available at: <https://www.middevon.gov.uk/residents/planning-policy/adopted-local-plan-evidence/landscape-character-assessment/> accessed 25/03/18

*impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks*", with paragraph 32 outlining that local plans and spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan, which was published in January 2018. While Policy EN01 seeks to support the *"least damaging option"*. It is considered therefore that the Neighbourhood Plan policies could be improved to support biodiversity net-gain, reducing the potential for residual adverse effects on the local environment. Securing net gain can include through measures such as connecting sites, habitat restoration and habitat re-creation.

- 5.7 The protection and enhancement of local biodiversity features is further supported by the policy provisions which safeguard open spaces. For example, Policy EN03 (Local Green Space) designates nine sites within the Neighbourhood Plan area for their recreational and amenity value, with proposals for development *"ruled out other than in very special circumstances"*. In this context, Policy CS02 (Existing Recreation Spaces) also seeks to safeguard existing areas used by the local community for recreational purposes. The protection of these spaces will strengthen locally important areas of biodiversity and aid connectivity through maintaining natural features and ecological corridors.
- 5.8 Policy CS03 'New Public Open Space' supports the provision of new public open space on land at the Glebe. In accordance with community consultation responses, provision of a community orchard will be supported at the Glebe, promoting the enhancement and enjoyment of this space. This is reiterated through Policy HS03 (The Glebe Housing Development Site) which sets out the provision for *"an area of public open space of at least 0.5 ha, including the planting of native tree species and hedging on boundaries."* The incorporation of biodiversity features into development will lead to a positive effect on biodiversity through retaining and enhancing important natural features and further preventing loss of key habitats, stating that the subdivision of existing plots will only be permitted where *"significant features such as trees, hedges or stone walls are preserved."*
- 5.9 A further key Neighbourhood Plan policy for promoting ecological networks will also be Policy EN02 (Rights of Way (Public Footpaths, Bridleways and Cycleways Network), which seeks to *"protect and/or enhance the value of the rights of way as a biodiversity corridor"*. This capitalises upon the findings of the Devon Biodiversity Records Centre Report (2014) which emphasised for the SPNP that linear green features provide important habitats and feeding routes for wildlife.<sup>12</sup>
- 5.10 In terms of site allocations, the positive effects anticipated as a result of development at The Glebe are discussed above. However it is also recognised that the site is bounded by hedges and trees on all sides, with an area of Priority Habitat Inventory 'No main habitat but additional habitat exists' located adjacent to the site, to the south. Therefore, development has the potential to result in damage to/ loss of these habitats and any associated species. Criteria set out within Policy HS03 (The Glebe Housing Development Site) requires that *"the development minimises the loss of existing trees and hedges and include additional planting and other measures to ensure a net gain in biodiversity"*. This will contribute positively towards minimising adverse effects on biodiversity within and surrounding the site. It is also noted that site specific impacts will be considered at the application stage should a specific scheme come forward.
- 5.11 The Tiverton Road Development Sites (Policy HS04) is made up of scrub/ grassland with dense hedgerows and trees along the site boundaries. Similar criteria is set out through Policy HS04 as HS03, requiring that *"existing boundary hedgerow and trees are retained, except where some loss is unavoidable to create safe vehicular access to the site"*. Where loss is unavoidable, Policy HS04 requires that this is *"mitigated by restoration and re-creation in an overall commitment to net-gain in biodiversity."* This would contribute positively towards maintaining

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<sup>12</sup> Wildlife Site Resource Map and Species Information for Neighbourhood Planning



and enhancing the local biodiversity offer; improving the area's valued green infrastructure network.

- 5.12 It is considered that the SPNP suitably addresses any potential effects on biodiversity, leading to **neutral effects** overall. Notably those linked to the Tiverton Road development site are anticipated to be avoided and mitigated with the potential for a net-gain in biodiversity, in accordance with Policy HS04. Broader positive effects are predicted in relation to the wider SPNP policy framework, through protecting and enhancing Silverton's local features and areas of biodiversity interest, and supporting the resilience of ecological networks.

## Climate change

- 5.13 In terms of climate change mitigation, housing and employment growth proposed through the SPNP and facilitated through the Neighbourhood Plan allocations will lead to increases in the built footprint of the Neighbourhood Plan area and stimulate additional traffic flows. This will lead to some inevitable increases in greenhouse gas emissions originating from the parish. However, given the scale of growth proposed, and the likelihood of improvements to energy efficiency and the adoption of new technologies, this is not considered to lead to significant effects in relation to climate change mitigation. In addition, the allocations proposed through the SPNP are located adjacent to the existing built-up area of Silverton, with good access to local services and facilities in the village. However while it is considered that this will help limit increases in greenhouse gas emissions from transport, this may be negated by the lack of major local employer in the parish, with new residents likely to commute to Exeter or other local towns.
- 5.14 Outside of the site allocation policies, the SPNP has a strong focus on improving traffic and promoting sustainable travel; namely through Policies TR01 – TR04. Policy TR03 (Non-Car Travel) supports *"proposals that further the development of an accessible network of safe footpaths, bridleways and cycle routes in and around the Silverton neighbourhood area"*, recognising the importance of upgrading, and where possible, adding to them to encourage more people to travel around locally without using a private vehicle. This is reiterated through Policy TR02 (Pedestrian Link to Main Road) and Policy EN02 (Rights of Way (Public Footpaths, Bridleways and Cycleways)) which seek to enhance pedestrian links in the Neighbourhood Plan area. This will support climate change mitigation through encouraging the uptake of sustainable travel and modal shift, helping to limit greenhouse gas emissions from transport in the Neighbourhood Plan area.
- 5.15 Climate change adaptation is considered through Policy EN04 (Minimising Flood Risk). The SPNP recognises flood risk as a key issue for parts of the parish, and therefore requires through Policy EN04 that *"All development proposals should show how they will incorporate Sustainable Drainage System (SuDS) principles and provision for their ongoing maintenance in order to buffer rainwater runoff and to ensure there is no adverse impact on local flood risk through development."* This is underpinned by the provisions of the NPPF (2018), and further supported by the Mid Devon Core Strategy (2007) and emerging Local Plan Review (2018) policies; particularly Core Strategy Policy COR1 1 (Flooding) and emerging Policy S9 (Environment). In terms of the allocations within the SPNP, all are located within Flood Zone 1., which is of low risk of flooding.
- 5.16 The issue of climate change adaptation is addressed in the SPNP through the protection and enhancement of green infrastructure. Notably, EN03 (Local Green Spaces) seeks to protect and enhance the network of green spaces present in the Neighbourhood Plan area. This is also supported through the design policies, including Policy BE01 (Local Character and Design Standards) and Policy EN01 (Retaining and Enhancing the Natural Environment). In this respect protecting and enhancing the green infrastructure network will be a key means of helping Silverton Parish adapt to the effects of climate change, leading to long-term minor positive effects. This includes through helping to regulate extreme temperatures, regulating surface

water run-off and supporting the ability of biodiversity species to adapt to the effects of climate change.

- 5.17 In conclusion, whilst the above approaches will contribute positively towards addressing climate change, these are not seen to be significant in the context of the SEA process. As such, the SPNP is predicted to have a residual **neutral effect** on climate change. There is the potential for some minor long term positive effects, but these are uncertain at this stage and dependent on the implementation of proposed measures).

## Historic environment

- 5.18 Silverton is one of the larger historic villages of Mid Devon dating back to the Domesday Book and before. Its Conservation Area covers a large part of the village and includes many listed buildings setting the character and charm of the old streets, central square and Church of St. Mary. As set out in the SPNP, a priority for the community is ensuring future development helps Silverton to grow sustainably, without destroying its heritage and traditions. Recognising the value of the area's rich heritage, the SPNP establishes robust standards for development proposals, underpinned by the aims and objectives of the Silverton Conservation Area Appraisal and Management Plan (2015).<sup>13</sup> Specifically, Policy BE02 (Local Heritage) requires the requisite Heritage Statements accompanying planning applications to *"identify the heritage assets, provide a clear assessment of the significance and impact of the proposal on those assets and to justify the design approach taken."*
- 5.19 The SPNP also recognises that *"any development that takes place in Silverton has the potential to have a negative or positive impact"* on the parish. In this context, Policy BE02 states that *"development proposals within or in proximity to the Silverton Conservation Area will be expected to demonstrate how they will positively conserve and enhance the unique characteristics of its location as identified in the Silverton Conservation Area Appraisal and Management Plan."* The potential for enhancement to the local environment is further promoted through policy BE01 (Local Character and Design Policies) which requires proposals to *"complement and enhance the character of the local area"*. This will contribute positively towards providing the strongest possible protection and enhancement measures for the heritage assets and townscape qualities in the SPNP area.
- 5.20 The quantum and distribution of growth proposed through a Neighbourhood Plan can be a key determinant of the nature of effects on a plan area's historic environment. It is important for new development not to detract from the vibrancy of historic character, though there can also potentially be opportunities for new development to enhance its historic character as well. The Silverton Neighbourhood Plan proposes distributing growth at small sites adjacent to the existing built area, outside of the settlement boundary. In the context of Silverton's built heritage sensitivities there is potential for effects from this proposed distribution of growth.
- 5.21 The Glebe Housing Development Site (Policy HS03) is located within the Silverton Conservation Area. The proposed development site lies on the edge of the historic core of the village and is highly visible from the churchyard. It is designated in the Conservation Area Appraisal as a *"space of merit"*. This is recognised through the SPNP, which highlights that *"design and layout will be critical"*. The SPNP is therefore supportive of *"a small-scale residential development, of up to five dwellings on a part of the site, if there is a significant and permanent community gain in terms of play and recreation space and a community woodland on the rest of the site that will be held in trust as a community asset to serve the recreation needs of the community in perpetuity."* In this context, Policy HS03 sets out a series of criteria for development at this site, including requiring provision for *"an area of public open space of at least 0.5 ha on the Glebe"*. In

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<sup>13</sup> Mid Devon District Council (2015) Silverton Conservation Area Appraisal and Management Plan [online] available at <https://www.middevon.gov.uk/media/114951/silverton-part-1.pdf>

terms of mitigating against adverse effects on the historic environment, *"development will be supported provided:*

- *the scheme is sensitive to its setting within the conservation area and its close proximity to the countryside; and*
- *the visual impact of the development from the Churchyard and the Berry is minimised. A developer would need to prepare a Heritage Assessment."*

5.22 It is considered that in line with Policy HS03, through sensitive design and layout, development has the potential to contribute positively towards protecting and enhancing the local historic environment.

5.23 The Tiverton Road Development Site (Policy HS04) is located on the settlement boundary and does not contain/ is not located close to a designated heritage asset. It is not anticipated that development of the site would lead to adverse effects on the historic environment. Similarly, the allocation of Roosters, Babylon Road Employment Site (Policy BJ01) is not anticipated to lead to adverse effects given it is a brownfield employment site, distant from the historic core of the village.

5.24 Effects of development on the local historic environment and villagescape are likely to be further managed through the implementation of Policy HS01 (Scale of Housing), which seeks to avoid large-scale development in the parish. Policy HS01 states that *"Proposals for housing development of five and fewer dwellings within or on the edge of the village and on sites allocated in the Neighbourhood Plan will be supported provided they conform to the other policies of this Plan."* This positively responds to local character, promoting development at an appropriate scale for the parish in accordance with the strategic context of the Local Plan.

5.25 Overall, it is considered that the SPNP, in accordance with the Silverton Conservation Area Appraisal and Management Plan (2015), provides a robust framework for the protection and enhancement of the local historic environment. However, careful consideration will need to be given to heritage features (Silverton Conservation Area) in the design and layout of any new development; particularly The Glebe Housing Development Site. **Uncertain minor negative effects** are therefore anticipated due to the sensitivity of the historic environment and the potential for the site allocation to adversely impact upon the Silverton Conservation Area. It is however noted that given the scale of the site, any adverse effects are unlikely to be significant, and that any mitigation provided may result in a residual neutral effect. However, this is uncertain at this stage.

## Landscape

5.26 While no part of Silverton parish is included in any national landscape designations, the parish does comprise three main landscape character areas for which management guidelines have been set out by Mid Devon District Council.<sup>14</sup> These strategic guidelines have informed the SPNP, notably policy EN01 (Retaining and Enhancing the Natural Beauty of our Parish) which states that *"where mitigating measures are unavoidably required for development to be acceptable within its landscape setting, appropriate landscaping should be employed to mitigate the impact of the development, and such measures should include the use of native species of trees and hedges where planting is required."* Further to this, Policy EN01 identifies the importance of traditional Devon hedges as valued landscape features. This reiterates the Mid Devon LCA (2011) which notes hedgerows and Devon banks as *"being major contributory factors to the distinct special quality of the area and worthy of protection and/or enhancement."* However, as discussed under the 'Biodiversity' SEA theme, it is considered that the policy could

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<sup>14</sup> Mid Devon District Council (2011) Mid Devon Landscape Character Assessment [online] available at: <https://new.middevon.gov.uk/media/103735/introduction.pdf>

be improved to support habitat restoration and habitat re-creation, to reduce any residual adverse effect on overall landscape character and appearance.

- 5.27 The protection of local landscape character and appearance is further supported through Policy BE01 (Local Character and Design Standards), which recognises that the design, height and scale of new properties in the parish are key influences on landscape character. In this context the policy requires that development proposals be of a design that *"compliments and enhances where appropriate the prevailing size, height, scale and mass, materials, layout, density and access of the existing surrounding development"*. Policy BE01 also places a focus on mitigation and landscape enhancement measures, supporting proposals that *"minimise visual impact through sensitive design and an appropriate level of landscaping and screening which complements and enhances the character of the local area."* This is reiterated through policy TR04 (Off Road Parking) which requires that provision of off-road parking *"be suitably landscaped"*.
- 5.28 The intrinsic qualities of the local landscape are afforded a level of protection through the SPNP policies which recognise the importance of community spaces. In this context, Policies CS02 (Existing Recreation Spaces), CS03 (New Public Open Spaces), and EN03 (Local Green Space) set out the management and maintenance objectives for outdoor spaces, which will contribute positively towards maintaining the rural character of the parish. Policy EN03, notably, designates nine areas of Local Green Space because they are *"local in character"* and *"because of [their] beauty, historic significance, recreational value (including as a playing field), tranquility or richness of wildlife"*. This provides a level of protection and support for improvement, to the local landscape, with the potential for long term positive effects.
- 5.29 In terms of the SPNP site allocations, the Glebe Housing Development Site (Policy HS03) is located adjacent to the existing settlement to the north, and is recognised through the SPNP as *"currently part of the countryside that surrounds the village."* There is significant community concern about the visual impact of any development on the character of this part of the village, and it is recognised that while there is a level of vegetative screening present, the site offers views to the open landscape to the south, which may be impacted by development. Additionally, development has the potential to set precedent for further development to the south, which may alter the existing character of the village, and lead to adverse effects on the wider landscape. Policy HS03 seeks to address potential adverse effects on landscape by requiring that *"the scheme is sensitive to its setting"* and *"the development minimises the loss of existing trees and hedges and include additional planting and other measures"*. Further to this, *an integral part of the development is the "provision for an area of public open space of at least 0.5 ha on the Glebe"*, which may further limit adverse effects on landscape by providing a 'buffer' to the small residential development proposed (5 dwellings).
- 5.30 The Tiverton Road Development Site (Policy HS04) is a smaller site (allocated for 2 dwellings) located on the edge of the village, surrounded by open countryside. Given its location, it is recognised through the SPNP as requiring *"sensitive design and layout to ensure that its visual appearance and impact on the local environment is minimised."* To this effect, development proposals *"will be supported provided:*
- I. use the existing topography to ensure that there will be no unacceptably detrimental impact on the skyline;*
  - II. existing boundary hedgerow and trees are retained, except where some loss is unavoidable to create safe vehicular access to the site"*
- 5.31 This will ensure that any potential landscape impacts associated with development proposals at this location are appropriately mitigated where possible.
- 5.32 The allocation of Roosters, Babylon Road Employment Site (Policy BJ01) is not anticipated to lead to adverse effects on the landscape given it is a brownfield employment site to be redeveloped for light industrial use. While the site is disconnected from the existing settlement

in the open landscape, in line with Policy BJ01, proposals for redevelopment will *"include adequate and appropriate screen-planting to minimise visual impact and ensure that adjoining uses are not adversely impacted by business activity on the site"*. This supports the regeneration of underutilised previously developed land within the parish providing that proposals can demonstrate there will be no negative impacts to the character and appearance of the surrounding countryside. .

- 5.33 Effects of development on landscape character are likely to be further managed through the implementation of Policy HS01 (Scale of Housing), which seeks to avoid large-scale development in the parish. Policy HS01 states that *"Proposals for housing development of five and fewer dwellings within or on the edge of the village and on sites allocated in the Neighbourhood Plan will be supported provided they conform to the other policies of this Plan."* This positively responds to local character, promoting development at an appropriate scale for the parish in accordance with the strategic context of the Local Plan.
- 5.34 Overall, it is considered that the SPNP provides a robust framework for the protection and enhancement of local landscape character. Whilst the proposed allocation may have some impacts on landscape character, given the size and proposed capacity of sites (seven dwellings in total) it is envisaged that any residual effects will not be significant. Additionally, in line with the SPNP policies, incorporating landscape features into design and ensuring that development respects the existing villagescape and character of the surrounding countryside will help limit potential effects. It is therefore considered that the Neighbourhood Plan has the potential to lead to residual **neutral effects** on the landscape.

## Land, soil and water resources

- 5.35 The Roosters, Babylon Road Employment Site allocation (Policy BJ01) will take place on previously developed land. This will promote the efficient use of land through precluding the loss of productive agricultural land and facilitating the intensification of uses at this location.
- 5.36 However, the two housing site allocations proposed through the SPNP are located on greenfield land. In terms of the quality of agricultural land, the Silverton Neighbourhood Plan Local Evidence Report (2014) indicates that the Glebe site is made up of Grade 1 (0.16ha), Grade 2 (0.03ha), and Grade 3 (0.86ha) land.<sup>15</sup> While it is recognised that Grade 1 and 2 land is best and most versatile, there is no detailed information available to determine whether the Grade 3 land is Grade 3a (i.e. land classified as the best and most versatile) or Grade 3b (which is not). In terms of the Tiverton Road Development Site, it is not possible to confirm if development will result in a loss of best and most versatile agricultural land, as recent detailed classification has not been undertaken at this location. However, based on the national 'Provisional Agricultural Land Quality' dataset, the site is located on land which is classified as Grade 2. It is therefore considered that development at both sites would lead to the loss of higher quality soil resources.
- 5.37 It is considered that the policies which support green infrastructure enhancements and new and improved open space (including policies EN01 – EN03 and policies CS02 – CS03) will enhance the quality of land and water resources. This includes through promoting the ability of natural processes to support soil and water quality.
- 5.38 Water quality is further addressed indirectly through Policy HS01 (Scale of Housing Development), which seeks to limit development in the parish to *"five and fewer dwellings"*. Avoiding large-scale growth will ensure that water quality will not be placed under further pressures by new development's impact on the sewerage network.

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<sup>15</sup> Silverton Parish Council (2014) Silverton Neighbourhood Plan Local Evidence Report

- 5.39 Overall however, the SPNP is predicted to have a **long term significant negative effect** in relation to land, soil and water resources, due to the permanent loss of best and most versatile agricultural land.

## Population and community

- 5.40 The SPNP allocates three sites for development; comprising of two housing allocations and one employment site allocation. The development of these sites will deliver seven new dwellings in the parish; reflecting the local community's preference for smaller incremental development in accordance with Policy HS01 (Scale of Housing Development). This will contribute positively towards meeting the housing needs arising locally; in accordance with the conclusions of the Housing Needs Survey (2016) which "*indicated a local need for smaller dwellings for singles and couples.*"
- 5.41 In terms of the quality of housing, the SPNP highlights that recent development in the village has largely been infill or redevelopment sites, which has raised local concerns in terms of density and design. The SPNP seeks to address this, placing focus on the high quality design and layout of new housing. This is evidenced through Policy BE01 (Local Character and Design Standards) which requires that "*proposals be accompanied by a statement that sets out:*
- I. an assessment of the character of the site and its context;*
  - II. how the proposed development fits in with these specific characteristics; and*
  - III. how the Silverton Design Statement has been taken into account."*
- 5.42 In terms of the delivery of a mix of housing, Policy HS02 (Meeting the Local Housing Need) requests that development proposals be cognisant of the local housing market, demonstrating how they "*help maintain a relevant and balanced mix of housing types and sizes*" and "*reference the most recent Housing Needs Assessment for Silverton (2016)*".<sup>16</sup> This will lead to long term positive effects through delivering the type and size of new housing that reflects local need and contributes towards widening of choice.
- 5.43 The Housing Needs Survey (2016) identified a significant local need for affordable housing in the parish. However, the Parish Council recognise that the SPNP cannot set a requirement for a proportion of housing to be 'affordable' when only development of "five dwellings or less" is supported through the Plan (Policy HS01). The SPNP therefore seeks to address this through Policy HS05 (Community Housing) by encouraging and facilitating a community housing initiative. In this context, "*Community Housing schemes of more than five dwellings will be supported on a site, or sites in locations within a reasonable and safe walking distance of existing community facilities, where development would not otherwise be permitted*". Policy HS05 further sets out a range of criteria to be met for development to be supported, including requiring that "*the land is held in trust as a community asset in perpetuity*". This will contribute positively towards meeting local needs and will provide for the long term benefit of the community.
- 5.44 Silverton village functions as a community hub for the parish, and as such the SPNP seeks to ensure it maintains an active and thriving place to live. Notably, this is addressed through Policies CS01– CS04 which proactively seek to protect and enhance the community offer, including through protecting community facilities and assets, and providing support for new public open space. This will likely deliver long term positive effects in terms of community cohesion, promoting active, engaged neighbourhoods with low levels of deprivation.

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<sup>16</sup> Planning Advisory Service and AECOM (2015) Housing Needs Assessment for Neighbourhood Plans [online] available at: <http://www.pas.gov.uk/documents/332612/0/PASNP/5cd2a9da-dc5e-4c5c-a982-e2f4a23d3fcc>



- 5.45 Limited opportunities for employment exist in the Neighbourhood Plan area; and as such the parish experiences high levels of out-commuting to Exeter or to other local towns and beyond. The results of Community Consultation (2014) indicated that *“residents would like to see an increased level of job opportunities in the parish, particularly so that school leavers feel that they do not have to leave the area to find suitable employment.”* In response to this, the SPNP through Policy BJ01, *“supports redevelopment proposals to protect existing or provide improved business/ employment space at the [Roosters] site”*. The redevelopment of brownfield land for industrial use at this location will contribute positively towards improving the employment offer of the parish, and supporting local economic vitality.
- 5.46 The economic growth of the parish is further supported through Policy BJ02 (Super-fast Connectivity), which *“supports the development of a super-fast broadband infrastructure to serve the Silverton neighbourhood area where it is sensitively sited and sympathetically designed.”* Further to this, *“All new residential, educational and business premises should be served by a superfast broadband (fibre-optic) connection installed on an open access basis.”* This provides a proactive response to the distinct growth in home working in the parish, despite the limitations of the local broadband service. The delivery of Policy BJ02 will therefore lead to long term positive effects through ensuring local business development is supported and local working opportunities remain available.
- 5.47 Overall, the SPNP is predicted to have residual **long term significant positive effects** on population and community. It is thought that the SPNP will support the various needs of the local community, addressing local housing needs as well as protecting and enhancing the community infrastructure offer. The SPNP will also support the growth of the local economy through capitalising on regeneration opportunities and encouraging local business development in the long term. This will positively support the overall quality of life of residents.

## Health and wellbeing

- 5.48 Health and wellbeing are influenced by a wide range of factors which will vary by local context, some of which are realistically beyond the scope of the Neighbourhood Planning process. However, in terms of factors such as maintaining an attractive living environment, encouraging and enabling modal shift to cycling and walking and providing or enhancing access to recreation facilities there are a range of potential opportunities to facilitate positive effects through planning.
- 5.49 Silverton village functions as a community hub for the parish, and as such the SPNP seeks to ensure it maintains an active and thriving place to live. Notably, this is addressed through Policies CS01– CS04 which proactively seek to protect and enhance the community offer, including through protecting community facilities and assets, and providing support for new public open space. This is considered likely to result in positive effects on health and wellbeing for both existing and new residents. In the context of the proposed allocation at the Glebe (Policy HS03), it is noted that the site is allocated on the basis that *“provision is made for an area of public open space of at least 0.5ha”*. This will likely deliver long term positive effects through improving access to open space and recreation for both new residents at the Glebe, and existing residents of the wider parish.
- 5.50 The delivery of open space at the Glebe site (Policy HS03) and through Policy CS03 (New Public Open Space) also presents opportunities to provide green linkages throughout the parish. The supporting text of CS03 also recognises that *“a wider range of accessible sports and recreational facilities would support the public health agenda by providing exercise and fitness opportunities”*. This acknowledges more broadly the potential for green infrastructure to have positive effects in relation to health and wellbeing by promoting healthier, more active lifestyles.
- 5.51 Active lifestyles are further promoted through the SPNP policies which encourage sustainable travel. TR02 (Pedestrian Link to Main Road) positions walking and cycling provision as a priority

consideration for new development, reflecting the importance the SPNP places on enabling residents have the opportunity to make journeys around the parish and the streets of the village without needing a car.

- 5.52 The PRow and footpaths are well used by local people and provide scenic views of the local countryside. Policy TR01 (Non-Car Travel) seeks to ensure the network is further developed where possible, with footpaths, bridleways and cycleways to encourage more people to travel around locally without using a private motor car and many more people to take regular exercise along with the increased level of safety offered. Positive effects are therefore anticipated through allowing more people to take regular exercise and enjoy the parish in which they live, though effects are likely to be minor.
- 5.53 In light of the above it is considered that the Neighbourhood Plan is likely to have a **minor long term positive effect** in relation to the health and wellbeing SEA theme.

## Transportation

- 5.54 The transportation SEA theme aims for the promotion of sustainable transport modes and minimising the need to travel where possible. In rural areas with a limited service offer and which are some distance from higher tier settlements this can be challenging, particularly where development proposed is not of a scale likely to make enhanced public transport provision viable. The SPNP sets out key objectives relating to traffic and road safety in the parish, particularly traffic speed, volume of HGV and agricultural traffic, and off-road parking.
- 5.55 Policy TR03 (Traffic Management) sets out principles against which applications for new developments will be expected to demonstrate consideration. This includes *"identifying the realistic level of traffic they are likely to generate"*, and subsequently *"assessing the potential impact of this traffic on pedestrians, cyclists, road safety, parking and congestion [...]"*. This is considered to represent an appropriate response to mitigating some of the localised identified transport issues within Silverton parish and ensuring that new development addresses, rather than contributes to, these issues.
- 5.56 Congestion issues are further addressed through the SPNP policies which seek to increase accessibility to, and provision of, sustainable transport. As discussed under the health and wellbeing SEA objective, policies TR01 (Non-Car Travel) and TR02 (Pedestrian Link to Main Road) require new development to consider providing new safe walking and cycling routes and extending existing routes where possible. This could help integrate new development with the village core and link to existing (albeit limited) bus services. Whilst recognising there are limits to the extent small development can effect infrastructure changes it is considered that this represents a sound principle for new development. .
- 5.57 Policy TR04 (Off Road Parking) and HS06 (Parking Spaces on Housing Development) focus specifically on parking standards, requiring that development proposals consider the Devon County Council and/ or Mid Devon District Council requirements. In a village with limited capacity for on-road parking and established traffic concerns it will be important for new development to meet its own need in terms of parking need. Policy TR04 also indicates that, where criteria is met, support will be given for development proposals providing additional public car parking to serving the village. This further contributes towards addressing the substantial parking problem experienced throughout the village.
- 5.58 It is considered that the Neighbourhood Plan is likely to have a **positive effect on the transportation SEA theme**.

## Conclusions

- 5.59 The appraisal has highlighted that the plan as a whole is likely to lead to positive effects in relation to three SEA themes: 'Population and community'; 'Health and wellbeing' and 'Transportation'. Neutral effects are anticipated in relation to the 'Climate Change' and 'Landscape' SEA themes. Uncertain negative effects are anticipated in relation to the 'Biodiversity' and 'Historic Environment' SEA themes, while negative effects are anticipated in relation to the 'Land, Soil and Water resources' SEA theme.
- 5.60 The range of positive effects are anticipated in light of the SPNP's potential to deliver housing in appropriate locations to meet local needs; that new development will be required to contribute new or enhanced walking or cycling connectivity, and will likely connect positively with the village's green spaces; and that new development will be expected to avoid contributing to on-street parking and link well with the village core.
- 5.61 The plan includes a number of approaches that will contribute positively towards addressing the Climate Change SEA objective; i.e. recognising the role that retaining and enhancing green infrastructure can play in increasing resilience, particularly increased flood risk. However this is not seen to be significant in the context of the SEA process, and therefore residual neutral effects are anticipated.
- 5.62 Neutral effects are anticipated in relation to the 'Landscape' SEA theme as any impact on landscape character through the delivery of the site allocations is not likely to be significant. This is given the level of growth proposed and the location of sites adjacent to the settlement boundary. Additionally, it is considered that mitigation will be provided through sensitive design and layout.
- 5.63 Uncertain minor negative effects are anticipated against the 'Historic Environment' SEA theme due to the sensitivity of the local historic environment and the potential for the Glebe site allocation to adversely impact upon the Silverton Conservation Area. It is however noted that given the scale of the site, any adverse effects are unlikely to be significant, and that the Neighbourhood Plan policies set out a range of provisions which are designed to conserve and enhance the fabric and setting of the historic environment. Any mitigation provided may result in a residual neutral effect.
- 5.64 Uncertain minor negative effects are anticipated against the 'Biodiversity' SEA theme because of the potential loss of habitat at the Tiverton Road development site. It is however considered that this can be suitably avoided and mitigated against if recommendations are adopted.
- 5.65 Significant negative effects are anticipated in relation to the 'Land, Soil and Water Resources' SEA theme, primarily in light of the fact that the allocation of the Glebe (and potentially Tiverton Road) will necessitate the loss of productive agricultural land with potential to be 'best and most versatile'.

## Recommendations

- 5.66 The following recommendation has been identified through the assessment of the SPNP:
- The Tiverton Road Development Sites (Policy HS04) could be revised to support habitat restoration and habitat re-creation at the site, in addition to an overall commitment to net-gain. This would contribute positively towards maintaining and enhancing the local biodiversity offer of Silverton Parish.

## 6. Next steps

- 6.1 This Environmental Report accompanies the Pre-Submission version of the Silverton Parish Neighbourhood Plan for Regulation 14 consultation.
- 6.2 Following consultation, any representations made will be considered by the Parish Council and the Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Mid Devon District Council for subsequent Independent Examination.
- 6.3 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Mid Devon District Local Plan, with due regard to the emerging Local Plan Review.
- 6.4 If the subsequent Independent Examination is favourable, the Silverton Parish Neighbourhood Plan will be subject to a referendum, organised by Mid Devon Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Silverton Parish Neighbourhood Plan will become part of the Development Plan for Silverton Parish.

# Appendix A Context review and baseline

## Air quality

### Context review

The UK's Air Quality Strategy<sup>17</sup> details a long-term vision for improving air quality in the UK, which involves objectives and policies for the different pollutants and the environmental implications associated with these.

Key messages from the National Planning Policy Framework<sup>18</sup> (NPPF) include:

*'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'*

*'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.'*

*'New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.'*

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>19</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency, and reducing pollution and waste' within the 25 year plan directly relate to the air quality SEA theme.

In terms of the local context, Mid Devon District is required to monitor air quality across the borough, report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide, Sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMA's) and local authorities are required to produce an Action Plan to improve air quality in the area.

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<sup>17</sup> DEFRA (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf) accessed 06/03/19

<sup>18</sup> MHCLG (2018) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 06/03/19

<sup>19</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 06/03/19

The Air Quality Annual Status Report (ASR) (2018) found that overall, improvements to both NO<sub>2</sub> and PM<sub>10</sub> concentrations within the district have been made at key locations along arterial routes, reflecting the Council's continued commitment to improving air quality.<sup>20</sup>

Additionally, at the local level, Policy DM6 (Transport and Air Quality) of the Local Plan relates to the Air quality SEA theme, requiring that *"development proposals that would give rise to significant levels of vehicular movement must be accompanied by an integrated Transport Assessment, Travel Plan, traffic pollution assessment and Low Emission Assessment."* This policy is replaced with Policy DM3 (Transport and Air Quality) in the Local Plan Review Proposed Submission Document.

## Summary of current baseline

As of March 2019, there are no Air Quality Management Areas (AQMAs) within the Neighbourhood Plan area. There are two AQMAs located within the Mid Devon District, in Cullompton (approximately 5km from Silverton Parish), and in Crediton (approximately 12km from Silverton Parish).

The Cullompton AQMA was designated in December 2006, this AQMA was declared for an area encompassing most of Cullompton town to the west of the M5. The reason for this designation was for exceedances of NO<sub>2</sub> at Station Road, Higher Street and Fore Street within the town centre.

The Air Quality Annual Status Report (ASR) (2018) found that overall, improvements to both NO<sub>2</sub> and PM<sub>10</sub> concentrations within the district have been made at key locations along arterial routes.

## Summary of future baseline

Whilst no significant air quality issues currently exist within the Silverton Parish Neighbourhood Plan area, new housing and employment provision within the parish and the wider area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO<sub>2</sub>. Areas of particular sensitivity to increased traffic flows are likely to be the village centre, and routes with heavier traffic flows; notably the network of old lanes which emanate from the village square.

However, baseline levels of air pollutants are reducing within Mid Devon District and as such significant issues are not currently anticipated.

Due to the absence of any significant air quality issues within the Neighbourhood Plan area, air quality has been scoped out for the purposes of the SEA process.

# Biodiversity

## Context review

The EU Biodiversity Strategy<sup>21</sup> 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<sup>22</sup> (NPPF) include:

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<sup>20</sup> Mid Devon District Council (2018) Air Quality Annual Status Report [online] available at:

[https://www.middevon.gov.uk/media/346132/6994\\_6978\\_mid-devon-asr-v2.pdf](https://www.middevon.gov.uk/media/346132/6994_6978_mid-devon-asr-v2.pdf) accessed 06/03/19

<sup>21</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244&from=EN> accessed 07/03/19

<sup>22</sup> MHCLG (2018) National Planning Policy Framework [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 07/03/19



*One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'*

*'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value[...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape across local authority boundaries.'*

*'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'*

*'To protect and enhance biodiversity and geodiversity, plans should:*

*Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*

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

*Take a proactive approach to mitigating and adapting to climate change, considering the long term implications for biodiversity.*

*The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.*

The Natural Environment White Paper (NEWP)<sup>23</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline of 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; the 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services'<sup>24</sup> aims to

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<sup>23</sup> HM Gov (2011) The Natural Choice: securing the value of nature [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228842/8082.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf) accessed 07/03/19

<sup>24</sup> DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf) accessed 07/03/19

*'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.*

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

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

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

At the local level, the following policies within the Mid Devon Local Plan relate to the biodiversity SEA theme:

- DM28 (Green Infrastructure in Major Development)
- DM29 (Protected Landscape)
- These policies are replaced with the following policies in the Local Plan Review Proposed Submission Document:
- DM26 (Green Infrastructure in Major Development)
- DM27 (Protected Landscape)

Additionally, Policy S9 (Environment) within the Local Plan Review Proposed Submission Document requires development to *"protect and enhance designated sites of international, national and local biodiversity and geodiversity importance."*

## Summary of current baseline

### Internationally designated sites

There are no internationally designated sites within close proximity to the Neighbourhood Plan area.

### Nationally designated sites

Killerton Site of Special Scientific Interest (SSSI) is located within 100m of the Neighbourhood Plan area, to the south.

Notified in 1986, the site covers much of Killerton Park and the quarries therein, and is one of the more accessible examples of Permian basalt-like rocks known as lamprophyres. The lamprophyres here are typical biotite-phyric minettes and although field relationships are often obscure, they are considered to be lava flows rather than the usual dyke-like bodies seen elsewhere.

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<sup>25</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 07/03/19

Based on the most recent condition assessments, Killerton SSSI is in 100% 'favourable' condition.

### **SSSI Impact Risk Zones (IRZs)**

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.

There are no areas within the Neighbourhood Plan area that are located within an IRZ for residential development, rural residential development or rural non-residential development.

### **Locally designated sites**

There are several areas of local significance for wildlife located within the Neighbourhood Plan area.

The range and significance of the non-statutory sites is as follows:

### **County Wildlife Sites (CWS)**

These are sites of County importance for wildlife, designated on the basis of the habitat or the known presence of particular species. This is not a statutory designation, and does not have any legal status.

The two CWS sites in Silverton are:

- Land Farm 9ha. Of semi-improved & unimproved neutral grassland, unimproved marshy grassland & small broadleaved copses; and
- Symonds Farm Orchard 0.7ha. of traditional orchard

### **Other Sites of Wildlife Interest (OSWI)**

These are sites of significant wildlife interest within a local context that have been surveyed but do not reach the criteria for County Wildlife Sites. OSWIs used to be called Local Wildlife Sites (LWS).

### **Unconfirmed Wildlife Sites (UWS)**

These are sites identified as having possible interest but not fully surveyed. Some of these sites will be areas of significant wildlife interest.

### **Ancient Woodland Inventory (AWI)**

Ancient Woodland is a term applied to woodlands which have existed from at least medieval times to the present day without ever having been cleared for uses other than wood or timber production. A convenient date used to separate ancient and secondary woodland is about the year 1600. In special circumstances semi-natural woods of post-1600 but pre1900 origin are also included.

The Devon Ancient Woodland Inventory was prepared in 1986 by the Nature Conservancy Council.<sup>26</sup> There are two types of ancient woodland, both of which should be treated equally in terms of the protection afforded to ancient woodland in the NPPF (2018):

Ancient semi-natural woodland (ASNW): where the stands are composed predominantly of trees and shrubs native to the site that do not obviously originate from planting. The stands may have been managed by coppicing or pollarding in the past, or the tree and shrub layer may have grown up by natural regeneration.

Plantations on ancient woodland sites (or PAWS, also known as ancient replanted woodland): areas of ancient woodland where the former native tree cover has been felled and replaced by planted stock, most commonly of a species not native to the site. These will include conifers such as Norway spruce or Corsican pine, but also broadleaves such as sycamore or sweet chestnut.

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<sup>26</sup> Nature Conservancy Council (1986) Devon Ancient Woodland Inventory) [online] available at: <http://www.dbr.org.uk/ancient-woodland-inventory-awi/> accessed 06/03/19

AWI are mapped online.<sup>27</sup> Notably, AWI are located to the north and south of the Neighbourhood Plan area.

## Woodland

The copses and wooded valleys which have mostly been allowed to remain or grown up where agriculture is not viable, provide a varied and diverse habitat for many wild creatures. These snips of woodland enhance the landscape.

A private, recently planted woodland between Singleton Park and Hayne House to the south east of the parish has been created using native broadleaved species. The public are allowed access via a permissive pathway and stiles.

## Geodiversity

The local geology comprises of Thorverton sandstone overlain by Cadbury breccias. There are distinctive rounded hills to the north east and west, providing an attractive backdrop of rising land. The conjunction of these rocks is thought to be the reason for streams surfacing in the locality. Basalt is also present and has been used for building stone.

## Summary of future baseline

Although there are no sites within Silverton Parish that have protection through statutory designations, there are many areas which are important to local biodiversity. As such habitats and species have the potential to come under increasing pressures from housing and employment land provision in the area. This includes through a loss of habitats and impacts on biodiversity networks. This may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

## Climate change

### Context review

The UK Climate Change Act<sup>28</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act includes the following:

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

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 develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the

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<sup>27</sup> Devon County Council (2019) map.devon [online] available at: <http://map.devon.gov.uk/dccviewer/?bm=OSGreyscale&layers=Historic%20Environment;0;1&activeTab=Historic%20Environment&extent=210064;27188;338387;150088> accessed 14/03/19

<sup>28</sup> GOV.UK (2008) Climate Change Act 2008 [online] available at: [http://www.legislation.gov.uk/ukpga/2008/27/contents?\\_sm\\_au\\_=\\_iVVt4Hr6tbignqNj](http://www.legislation.gov.uk/ukpga/2008/27/contents?_sm_au_=_iVVt4Hr6tbignqNj) accessed 06/03/19

2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report<sup>29</sup> contains six priority risk areas requiring additional action in the next five years, identified below:

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

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>30</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 6 'Protecting and improving the global environment', Goal 4 'A reduced risk of harm from environmental hazards such as flooding and drought' and Goal 7 'Mitigating and adapting to climate change' directly relate to the Climate Change SEA theme.

Key messages from the National Planning Policy Framework<sup>31</sup> (NPPF) include:

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

*'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*

*'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*

Direct development away from areas at highest risk of flooding (whether existing or future). *'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

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<sup>29</sup> GOV.UK (2017) UK Climate Change Risk Assessment Report January 2017 [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> accessed 07/03/19

<sup>30</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 07/03/19

<sup>31</sup> MHCLG (2018) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 07/03/19

The Flood and Water Management Act<sup>32</sup> 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)

Further guidance is provided in the document 'Planning for SuDS'.<sup>33</sup> 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 Mid Devon Climate Change Strategy and Action Plan (2016) sets out a number of objectives for ensuring the District's legislative compliance and contribution towards reducing the effects of climate change. The Strategy seeks to make a positive impact through the quality of housing and the environment, energy savings, planning decisions, choice of transport use and reducing carbon emissions. The strategy and action plan objectives are:

- To adapt to and mitigate the effects of climate change for the benefit of all who live, work and visit Mid Devon.
- To raise awareness about climate change and encourage action by staff, members, partners and the community.
- To promote sustainable development in the Council's decisions, policies and actions in conjunction with partners.
- To maximise our impact by working with partners and linking with the Local Enterprise Partnership.
- To encourage sustainable communities in Mid Devon and also lead our partners to work towards this objective.

At the local level, Core Strategy (2007) policy COR5 (Climate Change) states that "measures will be sought which minimise the impact of development on climate change, and contribute towards national and regional targets for the reduction of greenhouse gas emissions." This is replaced by Policy S9 (Environment) in the Local Plan Review Proposed Submission Document, which further seeks to "*minimise the impact of development on climate change*".

## Summary of current baseline

### Potential effects of climate change

Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office recently released the UK Climate Projections for 2018 (UKCP18).<sup>34</sup> UKCP18 provides the most up to date climate observations and projections out to 2100, using cutting-edge climate science.

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<sup>32</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> accessed 07/03/19

<sup>33</sup> CIRIA (2010) Planning for SuDS – making it happen [online] available at: <http://www.ciria.org/service/knowledgebase/AM/ContentManagerNet/ContentDisplay.aspx?Section=knowledgebase&NoTemplate=1&ContentID=18465> accessed 07/03/19

<sup>34</sup> Data released 26<sup>th</sup> November 2018 [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp> accessed 07/03/19



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 2040-2059 (at a 50% percentile) are likely to be as follows:<sup>35</sup>

- 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.

## Greenhouse gas emissions

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Mid Devon has had slightly higher per capita emissions compared to the South

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<sup>35</sup> Met Office (2018) Land Projection Maps: Probabilistic Projections [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> accessed 07/03/19



West, and England. Mid Devon has seen a similar reduction in emissions per capita between 2005 and 2015 (20%) compared to the South West (22%) and England (21%).

In relation to CO<sub>2</sub> emissions by end user, between 2005 and 2012 the proportion of emissions originating from industrial and commercial sources in Mid Devon fell from 31% to 29%. In the same period the proportion of total emissions from domestic sources increased slightly from 24% to 25%. Total emissions from road transport increased marginally from 40% to 41%.

## **Flood risk**

The Mid Devon Strategic Flood Risk Assessment (SFRA) identifies Silverton Mills and the B3185 at Silverton as 'flood warning coverage' areas for the River Culm (Lower) from Cullompton to Stoke Canon, including Hele.

Much of the parish is above the flood plain of the rivers Exe and Culm. Unless the weather is extreme (such as November/December 2012) the village area is normally free from flood risk apart from Park Road which floods regularly. Outside of the village, the road over the Culm River by the Killerton Estate floods seasonally in winter, along with the lower stretch of the lane below Silverton Paper Mill which leads up to Hele.

Silverton and Ellerhayes are at times cut off from Tiverton and Exeter due to the River Exe flooding at Bickleigh Bridge and Stoke Canon. New flood defences have been built at Stoke Canon during early 2014 to address this.

When the drains on Butterleigh Hill are blocked, the land is saturated and the springs overflowing. This causes Butterleigh Hill to flood, with water draining down to the existing built up area. This particularly affects houses located on the High Street and Fore Street where there is a constant risk of flooding. Flooding occurs most years when there is very heavy continuous rain. Local knowledge indicates that the leat which runs down High Street and Fore Street becomes blocked, resulting in water overflowing into houses. It is recognised that houses at risk retain sandbags for such occasions.

## **Summary of future baseline**

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change (including fluvial and surface water 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. However increases in the built footprint of the Neighbourhood Plan area may lead to increases in overall emissions.

## **Historic environment**

### **Context review**

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

Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.

Additionally, the NPPF states that Neighbourhood Plans should include enough information, where relevant, *“about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale”* and *“about local non-designated heritage assets including sites of archaeological interest to guide decisions”*.

The Government’s Statement on the Historic Environment for England<sup>36</sup> 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.

Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>37</sup> directly relates to the Historic Environment SEA theme.

The Mid Devon Town and Village Character Assessment (TVCA) (2012)<sup>38</sup> aims to provide a comprehensive analysis and evaluation of the character of towns, villages and hamlets within the Mid Devon district. By describing variations in the settlement character, the TVCA will help to ensure that future development respects the distinctive qualities of both the natural and built environment of Mid Devon.

A number of Mid Devon Local Plan policies seek to protect and enhance the historic environment, notably Core Strategy Policy COR2 (Local Distinctiveness) and Development Management Policy DM27 (Development Affecting Heritage Assets). Policy COR2 is replaced in the Local Plan Review Proposed Submission Document by Policy S9 (Environment) and Policy DM25 (Development affecting Heritage Assets). Policy DM25 states that the Council will *“require development proposals likely to affect heritage assets and their settings, including new buildings, alterations, extensions, changes of use and demolitions, to consider their significance, character, setting (including views to or from), appearance, design, layout and local distinctiveness, and the opportunities to enhance them.”*

## Summary of current baseline

Much of the character of Silverton Parish arises from its history being founded as a village in Saxon times. Several out-lying farms are mentioned in the Norman Domesday book and many of the original houses are situated running down Fore Street and across the square. The village is centred on The Square with its 15<sup>th</sup> Century Church House.

South east of the village, the hamlet of Ellerhayes was established in the early 20th century to provide housing for workers at the nearby Silverton Mill, all built in solid brick, **with a new development built in the 1960’s.**

## Heritage assets

The Neighbourhood Plan area has a rich historic environment, with numerous features recognised through historic environment designations. These include statutory listed buildings and a Scheduled Monument, which are nationally designated, the Silverton Conservation Area, which is designated at the local level.

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<sup>36</sup> 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](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed 05/03/18

<sup>37</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 05/03/18

<sup>38</sup> Mid Devon District Council (2012) Town and Village Character Assessment [online] available at: <https://www.middevon.gov.uk/residents/planning-policy/adopted-local-plan-evidence/landscape-character-assessment/> accessed 05/03/18

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.

### **Listed buildings**

Listing marks and celebrates a building's special architectural and historic interest.<sup>39</sup> Listed buildings hold special historic or architectural interest for the community; these buildings are often selected because they provide insights into the history of the region. There are three categories for listed buildings:

- Grade 1 (with exceptional interest, only 2.5% of all listed buildings)
- Grade II\* (with greater special interest, only 5.8% of all listed buildings)
- Grade II (with special interest, 91.7% of all listed buildings)

Any changes to a listed building require a consent application.

The Neighbourhood Plan area contains 61 listed buildings. Of these, one is Grade I listed and eight are Grade II\* listed:

- Parish Church of St Mary the Virgin (Grade I)
- Great Pit Farmhouse (Grade II\*)
- Ellerhayes Bridge (Grade II\*)
- Dunsmore Farmhouse (Grade II\*)
- Clysthayes Farmhouse (Grade II\*)
- 2, Fore Street (Grade II\*)
- 4, Fore Street (Grade II\*)
- 8, Fore Street (Grade II\*)
- 10 and 12, Fore Street (Grade II\*)

### **Scheduled Monuments**

A scheduled monument is an archaeological site of national importance which is included in the Schedule of Monuments kept by the Secretary of State for Digital, Culture, Media and Sport. There are over 200 categories of monuments on the schedule, representing features from a range of periods. Scheduled monuments are not always ancient, or visible above ground.

The regime is set out in the Ancient Monuments and Archaeological Areas Act 1979. The criteria for national importance are based on: period; rarity; documentation/finds; group value; survival/condition; fragility/vulnerability; diversity; and potential.

Once a monument is scheduled any works to it require scheduled monument consent from the Secretary of State, (not the local planning authority). Historic England manages the process of scheduled monument consent on behalf of the Secretary of State.

According to the National Heritage List for England there is one Scheduled Monument within the Neighbourhood Plan area.<sup>40</sup> This is 'Standing cross 6m south of St Mary's Church'.

### **Conservation Areas**

A Conservation Area is an area of special architectural or historic interest the character and appearance of which it is desirable to preserve and enhance. They are special areas where the

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<sup>39</sup> Historic England (2019) Listed Buildings [online] available at: <https://historicengland.org.uk/listing/what-is-designation/scheduled-monuments/> accessed 08/03/19

<sup>40</sup> Historic England: National Heritage List for England [online] available at: <http://list.historicengland.org.uk> accessed 08/03/19

buildings and the space around them interact to form distinctly recognisable areas of quality and interest.<sup>41</sup>

Conservation Areas are designated under the Planning (Listed Building and Conservation) Act 1990, section 69(1), by Local Planning Authorities. The Silverton Conservation Area was designated on 6th February 1973.

Silverton Conservation Area incorporates the historic core of the village and contains over 60 statutorily protected heritage assets, mostly dating from the late medieval period and includes the Parish Church of St Mary, Grade I Listed/

In 2015 MDDC held a public consultation on proposed boundary changes to the Conservation Area and adoption of a Conservation Area Appraisal and Management Plan (2015). The consultation ran from 2nd February until 16th March 2015. The Conservation Area boundary was subsequently adjusted to better take into account the architectural and historic built environment as set out in the guidelines of English Heritage on conservation areas.<sup>42</sup>

### **Character Areas in Silverton Conservation Area**

Throughout the Silverton Conservation Area the character varies. For example, the leafy green nature of the Church and Berry is very different to the 'hustle and bustle' of The Square. The Silverton Conservation Area Appraisal (2015) splits the Conservation Area into the following five different character areas:

- Fore Street and High Street
- Parsonage Lane, Prispen Meadow and King Street
- Tiverton Road and Exeter Road
- The Square
- The Church and The Berry

### **Views**

The village of Silverton is located on the side of a hill that has views across the Exe and Culm Valley. The rural backdrop and views and vistas obtained both in and out of the Conservation Area significantly contribute to its character and feel.

The Square, at the centre of the village is slightly raised above the surrounding area which provides long views down primary routes in all directions. The church tower of St Mary the Virgin can be seen from the entire Conservation Area and is a significant landmark in Silverton and the surrounding countryside.

The smaller roads and lanes in the Conservation Area generally have no footways for pedestrians and are bounded by buildings and tall boundary walls providing a private feel to these routes and restricted views.

Views of the surrounding countryside can be seen in small sections between buildings and in some areas over buildings to the north, west and east. Open swathes of farmland can be viewed to the west of Tiverton Road and to the south of Newcourt Road and parts of Church Road, although some of these views are only visible through gaps in the tall hedge banks.

### **Heritage at Risk Register**

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, historic parks and gardens, registered battlefields, wreck sites and Conservation Areas deemed to be 'at risk'.

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<sup>41</sup> Mid Devon District Council (2015) Silverton Conservation Area Appraisal and Management Plan [online] available at: <https://www.middevon.gov.uk/media/114951/silverton-part-1.pdf> accessed 08/03/19

<sup>42</sup>

According to the 2018 Heritage at Risk Register<sup>43</sup>, there are no heritage assets in the Neighbourhood Plan area at risk. However, it is important to recognise that the Heritage at Risk Register for areas outside of London do not contain information about the status of non-secular Grade II listed buildings. Due to this gap in the baseline, it is currently not possible to determine whether any Grade II listed buildings within the Neighbourhood Plan area are at risk.

It should be noted that not all of the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. For example, open spaces and key distinctive buildings in the area are likely to be of value for local people. The Mid Devon Historic Environment Record is mapped online, and identifies numerous HER monuments in the Neighbourhood Plan area.

### **Historic Landscape Characterisation**

The landscape in the immediate vicinity of Silverton has been categorised as comprising orchard, with the larger fields further out from the village categorised mostly as large 'Barton' fields, set out in the 15th to 18th centuries, although some may respect and follow pre-existing medieval field systems.<sup>44</sup>

### **Archaeology**

Archaeological evidence indicating prehistoric settlement is recorded in the wider landscape and documentary evidence suggests Silverton may have Saxon origins. The historic core has the highest potential for the presence of below-ground archaeological deposits, ranging in date from prehistoric through to the post-medieval period. In addition, there is the potential for the survival of medieval historic building fabric within later buildings.<sup>45</sup>

Historic maps indicate that the area may contain evidence of former historic field boundaries, which would survive as in-filled ditches and may provide evidence for early land division and property division.

The Silverton Conservation Area Appraisal and Management Plan (2015) identifies that any developments within Silverton may be subject to an archaeological investigation due to the historic nature of the village.

## **Summary of future baseline**

New development in the Neighbourhood Plan area has the potential to impact on the fabric and setting of Silverton's many cultural heritage assets; for example through inappropriate design and layout. Further growth is likely to lead to incremental but small changes in the character and setting of the historic settlement which can detract from its recognised special qualities. However, new development also has the potential to enhance the townscape setting and public realm to improve the setting of designated heritage assets, and can increase awareness of and access to heritage assets and their settings to the benefit of the historic environment.

## **Landscape**

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.

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<sup>43</sup> Historic England (2019) Heritage at Risk Record [online] available at: <https://historicengland.org.uk/images-books/publications/har-2018-registers> last accessed 11/03/2019

<sup>44</sup> Mid Devon District Council (2015) Silverton Conservation Area Appraisal and Management Plan [online] available at: <https://www.middevon.gov.uk/media/114951/silverton-part-1.pdf> accessed 08/03/19

<sup>45</sup> Mid Devon District Council (2015) Silverton Conservation Area Appraisal and Management Plan [online] available at: <https://www.middevon.gov.uk/media/114951/silverton-part-1.pdf> accessed 08/03/19

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.

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

The Mid Devon Landscape Character Assessment (LCA) (2011)<sup>46</sup> identifies the special qualities that give the landscape its sense of place. Recognised by Government and promoted by Natural England, it aids the planning, design and management of a landscape. The LCA seeks to ensure the compatibility with assessments undertaken by adjoining authorities and with the Devon Land Description Units.

At the local level, Core Strategy (2007) policy COR18 (Countryside) relates directly to the Landscape SEA objective. This policy is replaced by Policy S14 (Countryside) in the Local Plan Review Proposed Submission Document, which requires that *"development outside the settlements defined by Policies S10-S13 will preserve and where possible enhance the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy."*

## Summary of current baseline

The parish of Silverton is rural and largely agricultural, with a landscape of rolling hills and valleys. The small valleys are mostly wooded and there are plenty of natural broadleaved copses scattered throughout the Parish. The Parish stretches north to south above the Exe Valley and includes the village of Silverton and the hamlet of Ellerhayes. Some of the land is owned by the National Trust and belongs to Killerton Estate. Killerton Estate is a Georgian house set in 2,600 ha of working farmland, woods, parkland, cottages and orchards.<sup>47</sup>

### Mid Devon Landscape Character Assessment (LCA)

The character of Silverton is defined largely by its rural setting. According to the Mid Devon LCA 2011, the Parish comprises three identifiable Landscape Character Types (LCTs):<sup>48</sup>

- Upper Farmed and Wooded Valley Slopes (3A)
- Lower Rolling Farmed and Settled Valley Slopes (3B)
- River Valley Slopes and Coombes (3G)

The qualities and the forces for change are described in the LCA (2011) and set out below:

3A: Upper Farmed and Wooded Valley Slopes

*Description:*

The steeply rolling landform of this landscape type is located predominantly within the Exe Valley and Taw valley environs. The majority of this landscape type drains into the Exe Valley and is characterised by lush and fertile land giving rise to extensive tracts of medium-scale fields of permanent pasture.

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<sup>46</sup>Mid Devon District Council (2011) Mid Devon Landscape Character Assessment [online] available at: <https://www.middevon.gov.uk/residents/planning-policy/adopted-local-plan-evidence/landscape-character-assessment/> accessed 05/03/18

<sup>47</sup>National Trust (2019) Killerton [online] available at: <https://www.nationaltrust.org.uk/killerton> accessed 12/03/19

<sup>48</sup>Mid Devon District Council (2011) Mid Devon Landscape Character Assessment [online] available at: <https://new.middevon.gov.uk/media/103735/introduction.pdf> accessed 06/03/19

Dense, beech hedgerows are well managed and regularly shaped, medium to large-scale enclosures of pasture. Although this is a landscape dominated by small-scale farming, there are a few notable estates, including Hockworthy Court Hall, Huntsham Court and Holcombe Court (situated east of the River Exe).

#### *Special Qualities*

- Organic, textured, visually interesting landscape pattern
- Important ancient woodland and copses
- Secluded lanes with sparse traffic traversing an undulating often steep landscape
- Small-scale historic settlements and farms, often picturesque
- Good network of public rights of way including regional/promoted routes often using historic green lanes
- Small, picturesque, archetypical 'Devon' farmland

#### *Future Forces for Change*

- Development pressure from people moving to the area
- Amalgamation of fields has led to loss of hedges
- Variable management of Devon hedge-banks and hedgerows
- Uncertain future for the agricultural economy
- Continued trend in hobby farming and equine enterprises
- Climate change
- Higher demand for domestic food production leading to a further expansion in areas of arable and horticultural production and loss of rough grazing land
- Decline in traditional woodland management

### 3B: Lower Rolling Farmed and Settled Valley Slopes

#### *Description*

The main extent of this type is concentrated in a broad block of land located in the western part of the district north of Crediton and to the eastern part of the district between Tiverton, Cullompton and Culmstock.

This is a gently rolling and strongly undulating landscape which is broadly characterised by intensively farmed light soils, derived from the underlying sandstones, creating easily managed land that is versatile and enables agricultural operations to be wide ranging and for these farms to be productive.

#### *Special Qualities*

- Well-wooded and pastoral character created by the combination of regular patterns of dense hedges containing, permanent, grazed pastures and deciduous woodlands
- Patterns are strong and distinct and look unified and harmonious, particularly when viewed from distant vantage points
- Distant views with no or little development on top of hills
- A remote landscape with distinctive convex upper slopes with valued red rich fertile farmland, distinctive of the Devon Redlands
- Lovely mature oaks and other hardwood trees in hedgerows



- Many water related features such as springs, drains and ditches. These brooks dictate where settlement grew

#### *Future Forces for Change*

- Changes in farming including diversification, decrease in number of larger scale farms, with an increase in the number of non-farming activities
- Uncertain future for the agricultural economy
- Climate change
- Higher demand for domestic food production leading to a further expansion in areas of arable and horticultural production, loss of rough grazing land
- Continuing decline in rural skills such as woodland management and hedge laying
- Solar farms on south facing slopes
- Continued development pressure
- Ongoing increase in commuting and visitor traffic requiring traffic management and road engineering works out of keeping with the character of the landscape's narrow rural lanes
- Increase in domestic tourism with associated demands for new facilities and infrastructure, farm conversions and caravan/camping sites

### 3E: Lowland Plains

#### *Description*

This landscape is mainly located to the east and west of the River Exe, and River Taw.

The river valleys have steep, wooded sides. In the upper valleys, particularly in summer, there is a very strong sense of enclosure within a lush valley landscape containing attractive, fast flowing streams.

Some of the main areas of trees are ancient semi-natural woodland. These are historically important fragments that are left over by farmers where the slopes were considered too steep for cultivation.

#### *Special Qualities*

- Patterns are strong and distinct and look unified and harmonious, particularly when viewed from distant vantage points.
- The lack of extensive settlements and the relative isolation of farms and small-scale villages in this landscape type create a strong sense of serenity.
- This is both an impressive and 'beautiful' landscape that is colourful and has textural variety in the land cover and traditional land uses.
- Woodlands are highly valued for their colours and textures and give an intimate, secretive feel to the landscape.
- The presence of rivers and streams are important for providing wildlife habitats and for recreational uses

#### *Future Forces for Change*

- Increased tourism and associated river activities such as angling, walking alongside river, kayaking & canoeing, leads to increased traffic flows on rural roads and requirements for associated facilities and infrastructure.
- Climate change may lead to summer drought potentially drying out wet woodland and valley mires, affecting their functions in capturing carbon dioxide and storing water, (to prevent downstream flooding).

- Climate change may lead to longer growing season and enhanced growth rates of vegetation including bracken, gorse and secondary woodland resulting in a further scrubbing of rough grazing land.
- Climate change may lead to change in woodland / tree species composition as new pests/diseases spread and species intolerant of water level extremes die back. Individual trees may become more susceptible to damage from the increasing frequency and magnitude of storm events.
- Decline in grazing levels on steep valley sides, leading to a spread of bracken and gorse, scrub and secondary woodland.
- Increased demand for bio-energy crops, including short rotation coppice as well as drive towards active woodland management to produce wood-fuel as a low carbon fuel source.
- Increased risk of flooding due to climate change and reduced water quality from increased public use and farming techniques.
- Peace and tranquillity interrupted by main roads running along the lower valley slopes.
- Government drive for increased afforestation.
- No predator control (e.g. minks)

Mid Devon District Council's strategic guidelines within the LCA (2011) sets out management procedures, and are intended to influence local landscape policies.<sup>49</sup>

## Summary of future baseline

New development has the potential to lead to incremental but small changes in landscape character and quality in and around the Neighbourhood Plan area which is identified in many areas as high value with numerous special qualities.

Future changes to the landscape are likely to include the loss of landscape features and visual impact. However, new development also has the potential to enhance the townscape setting and public realm.

## Land, soil and water resources

### Context review

The EU's Soil Thematic Strategy<sup>50</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive<sup>51</sup> (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 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;

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<sup>49</sup> Mid Devon District Council (2011) Mid Devon Landscape Character Assessment [online] available at: <https://new.middevon.gov.uk/media/103735/introduction.pdf> accessed 06/03/19

<sup>50</sup> European Commission (2006) Thematic Strategy for Soil Protection [online] available at: [http://ec.europa.eu/environment/soil/three\\_en.htm](http://ec.europa.eu/environment/soil/three_en.htm) accessed 06/03/19

<sup>51</sup> European Commission (2000) Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy [online] available at: [http://ec.europa.eu/environment/water/water-framework/index\\_en.html](http://ec.europa.eu/environment/water/water-framework/index_en.html) accessed 06/03/19

- 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<sup>52</sup> (NPPF) include:

*'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*

*recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*

Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.

*'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*

*'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'*

*Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'*

*Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.*

*Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.*

*The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.*

Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>53</sup> directly relates to the land, soil and water resources SEA theme.

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<sup>52</sup> MHCLG (2018) National Planning Policy Framework [online] available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 06/03/19

<sup>53</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 06/03/19

Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>54</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>55</sup>, 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 England<sup>56</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The National Waste Management Plan<sup>57</sup> provides an analysis of the current waste management situation in England, and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>58</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The Devon County Waste Plan (2014) sets out the overarching principles and policy direction for waste planning in Devon.<sup>59</sup> It also identifies strategic sites for energy recovery across the County and a series of planning policies for making decisions on planning applications. The Plan covers the period to 2031.

The emerging Mid Devon Local Plan Review (2018) will replace several policies in the adopted Mid Devon Core Strategy (2007) that relate to the land, soil and water SEA theme. Including:

- DM28 Green Infrastructure (to be replaced by Policy S9 (Environment))
- DM22 Agricultural Development (to be replaced by Policy DM20 (Agricultural Development))
- DM30 Other Protected Sites (to be replaced by DM28 (Other Protected Sites))

## Summary of current baseline

### Land quality

The Neighbourhood Plan area does not have a history of heavy industrial land use. This does not preclude the potential for localised soil or groundwater contamination to be present, particularly on land surrounding the built-up area.

### Soil resources

The Agricultural Land Classification (ALC) classifies land into size grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land. At the local level a detailed classification has not been undertaken within the Neighbourhood Plan area. As such, there is a need to rely on the national 'Provisional Agricultural Land Quality' dataset.

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<sup>54</sup> DEFRA (2009) Safeguarding our Soils: A strategy for England [online] available at:

<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [accessed 06/03/19]

<sup>55</sup> DEFRA (2011) Water for life (The Water White Paper) [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228861/8230.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf)

[accessed 06/03/19]

<sup>56</sup> DEFRA (2011) Government Review of Waste Policy in England [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69401/pb13540-waste-policy-review110614.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf) accessed 10/12/18

<sup>57</sup> DEFRA (2013) Waste Management Plan for England [online] available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/265810/pb14100-waste-management-plan-20131213.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf) accessed 11/03/19

<sup>58</sup> Directive 2008/98/EC

<sup>59</sup> Devon County Council (2014) Devon Waste Plan [online] available at: <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan> accessed 11/03/19

The Provisional Agricultural Land Quality dataset shows a mixture of agricultural grades within the Neighbourhood Plan area, however predominately Grade 3 is seen. It is uncertain if this is Grade 3a (best and most versatile) or Grade 3b. There are also areas of Grades 1 and 2 agricultural land present to the south of the Neighbourhood Plan area; notably areas of Grade 2 appear to be located within/surrounding Silverton village.

## Water quality

Heal-eye Stream is the main watercourse flowing through the plan area, and ultimately joins the River Exe, which runs close to the western border of the plan area. The Butterleigh Hill stream also runs through the village and beside the Rec.

The Neighbourhood Plan area is divided between the Exe Main, and Clyst and Culm Operational Catchments.

Exe Main contains 27 identified waterbodies, categorised as follows:

- Ecological status; 10 good, 15 moderate, 1 poor 1 bad.
- Chemical status; 27 good.

Clyst and Culm contains 19 identified water bodies, categorised as follows:

- Ecological status; 8 moderate, 10 poor, 1 bad.
- Chemical status; 19 good.

## Water resources

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. A small and narrow band running from the south-west corner of the plan area is designated within Zone 3 (Total Catchment), defined by "the total area needed to support abstraction or discharge."

The EU 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. These areas are designated as Nitrate Vulnerable Zones (NVZs) and, as such, are recognised as being at risk from agricultural nitrate pollution. Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. The southern half of the plan area is located in an NVZ.

## Waste management

There are no Household Waste Recycling Centres within the Silverton Parish. The closest Household Waste Recycling Centre is Ashley Recycling Centre, approximately 10 km from Silverton.

## Summary of future baseline

Further development has the potential to affect water quality through diffuse pollution, waste water discharges, water run-off, and modification. However, it is considered that water companies are likely to maintain adequate water supply and wastewater management over the Neighbourhood Plan period.

It is unlikely that development proposed through the SPNP would have a significant impact on the wider area's NVZ unless agricultural intensification occurs.

# Population and community

## Context review

Key messages from the National Planning Policy Framework<sup>60</sup> (NPPF) include:

*One of the three overarching objectives of the NPPF is a social objective to; 'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*

*To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*

*The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site where possible.*

*Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.*

*In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.*

*Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

*Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.*

*Ensuring that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.*

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>61</sup> warns that society is underprepared for an ageing population. The report 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

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<sup>60</sup> MHCLG (2018) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 07/03/19

<sup>61</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf> accessed 05/03/19

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.

Policies contained in Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>62</sup> directly relates to the Population and Communities SEA theme.

The Devon Joint Health and Wellbeing Strategy 2016 – 2019 sets the priorities and overall approach for the Devon Health and Wellbeing Board.<sup>63</sup> Both priorities and approach have been reviewed by the Board for 2016 – 2019 and a new vision is set out. This focuses on place-based health and empowering people to take greater control over their own lives, to influence personalised services and to take greater responsibility for their health outcomes.

The Communities Strategy for Devon 2017 – 2020 is a first step in setting out how Devon County Council aim to work more closely with local communities and the voluntary and independent sectors to find new ways to help meet some of the big social and environmental challenges shared.<sup>64</sup> The Strategy seeks to deliver the following Vision for Devon:

*"To have flourishing people and communities that are strong, kind, compassionate and safe."*

In order to deliver this Vision, the Strategy identifies Seven Action Areas and four closely related Guiding Principles for designing and delivering activities. They will help to *"build and unlock Devon's collective capacity, enabling people's needs to be met in the most appropriate, sustainable and fair way."* The four Guiding Principles are:

- Connection
- Control
- Equality
- Working differently

For each of the Guiding Principles, statements have been provided through the Strategy, describing aspirations for communities and for the Devon County Council.

At the local level, the emerging Local Plan Review (2018) sets out the Spatial Strategy for development. This includes:

- Creating a prosperous economy which increases inward investment into the district
- Meeting objectively assessed needs for development, guided to locations which are or can be made sustainable, achieving a suitable balance of housing, employment, facilities and other uses within towns, villages, neighbourhoods and rural areas
- Reducing the need to travel by car, increasing the potential of public transport, cycling and walking
- Promoting social inclusion and reduce inequalities by enhancing access for all to employment, services and housing

This will be supported by saved policies of the Core Strategy (2007), Allocations and Infrastructure Development Plan Document (2011), and Development Management Policies (2013).

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<sup>62</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 05/03/19

<sup>63</sup> Devon County Council (2016) Joint Health and Wellbeing Strategy 2016 – 2019 [online] available at: <http://www.devonhealthandwellbeing.org.uk/strategies/> accessed 05/03/19

<sup>64</sup> Devon County Council (2017) Communities Strategy 2017 – 2020 [online] available at: <https://www.devon.gov.uk/communities/community-strategy> accessed 05/03/19



## Summary of current baseline

### Population

The population of Silverton ward of Silverton Parish has increased by 4.05% between 2001 and 2011. The rate of population increase in the Neighbourhood Plan Area was lower than the rate of increase for Mid Devon (11.43%), the South West (7.31%) and England (7.88%).

The percentage of residents within the 60+ age category in the Neighbourhood Plan Area (30.99%) is higher than that for Mid Devon (27.90%), the South West (26.41%) and England (22.30%). Conversely, there is a lower proportion of younger residents (aged 0-24) in Silverton Parish (22.95%) compared to Mid Devon (31.6%), the South West (28.87%) and England (30.8%). Additionally, 42.62% of residents within the Neighbourhood Plan area are aged 25-59, which is lower than the totals for Mid Devon (45.93%), the South West (44.72%) and England (46.9%).

In terms of ethnicity, of the 1,875 usual residents in 2011, 66.08% identified with a religion, the majority of which were Christian (64.96%). 0.3% identified themselves as Buddhist, 0.1% as Jewish, 0.3% as Muslim, 0.5% as other religions and 7.9% preferred not to state their religious beliefs.

99.2% of the usual residents in 2011 identified themselves as white, 0.4% as mixed, 0.25% as Asian and 0.1% as other ethnic groups.

### Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation. These are summarised 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

50.42% of households in Silverton are deprived in some form. This is lower than the proportion of deprived households seen in Mid Devon (54.88%), the South West (55.24%) and England (57.5%). This indicates that Silverton is not only less deprived than larger scale geographies, but is less deprived than other communities within Mid Devon.

### Housing

In 2011, there were 839 dwellings in the Silverton Parish. The majority of the dwellings in the area are detached, semi-detached or terraced houses and bungalows (91.3%). The remaining 8.7% of dwellings within the Parish were flats, maisonettes, apartments, and caravans or other mobile structures.

There is a high rate of home ownership in the Neighbourhood Plan area. 77.76% of Silverton residents own their own home (either outright or with a mortgage); a higher proportion of home ownership than at district (69.07%), regional (67.4%) or national (63.3%) levels. There is a small proportion of residents living in social rented accommodation (9.18%), and a slightly higher proportion in private rented accommodation at 12.51%.

In the last 12 months, Zoopla<sup>65</sup> identified 28 sales in the Silverton area, with an average price paid of £312,389, which is higher than the average price paid for dwellings in Devon (£277,468).

## Education

Based on the 2011 census data, only 17.7% of the residents in Silverton have no qualifications. This is lower than the totals for Mid Devon (22.7%), the South West (20.7%) and England (22.5%). Additionally, there is a greater proportion of residents within the Neighbourhood Plan area with level 4 qualifications or above (34.31%) compared with the district (23.15%), regional (23.59%) and national (27.38%) totals.

## Employment

The following three occupation categories account for the greatest proportion of residents in Silverton:

- Managers, directors, senior officials.
- Skilled trades occupations.
- Professional occupations.

In the Neighbourhood Plan area, 87.73% of residents work in these three occupation tiers, a higher proportion than the district (47.45%), regional (40.96%) and national (39.72%) level. This reflects the high proportion of qualified and skilled residents in the Neighbourhood Plan area.

## Summary of future baseline

Population trends indicate a growing and ageing population within the Neighbourhood Plan area. This can have implications for housing and may indicate a need for more specialist accommodation to meet the needs of the elderly in the future.

Overall levels of deprivation in the Neighbourhood Plan area are likely to remain low, particularly given Silverton is not only less deprived than larger scale geographies, but is less deprived than other communities in the District. Additionally, there is a notably high proportion of qualified and skilled residents in the Neighbourhood Plan area, which may contribute positively towards maintaining low levels of deprivation.

## Health and wellbeing

Key messages from the National Planning Policy Framework<sup>66</sup> (NPPF) include:

One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*

*'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

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<sup>65</sup> Zoopla (2018) House prices in Silverton [online] available at: <https://www.zoopla.co.uk/house-prices/silverton/> accessed 07/03/19

<sup>66</sup> MHCLG (2018) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 07/03/19

*Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.*

*Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.*

*Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*

The policies contained in Chapter 3 'Connecting people with the environment to improve health and wellbeing' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'<sup>67</sup> directly relates to the health and wellbeing SEA theme.

Other key national messages in relation to health include; Fair Society, Healthy Lives<sup>68</sup> ('The Marmot Review') which 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<sup>69</sup> 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) (2018) provides an assessment of the current and future health and wellbeing needs of the people of Devon. The latest report focuses on headline facts uncovered by the most recent data analysis. Key themes include:

- Population;
- Economy;
- Environment;
- Child and adult health.

At the local level, Core Strategy (2007) Policy COR1 (Sustainable Communities) seeks to "manage growth [in Mid Devon] so that development meets sustainability objectives, brings positive benefits, supports the diverse needs of communities and provides vibrant, safe, healthy and inclusive places where existing and future residents want to live and work." This policy will be replaced by emerging Local Plan Policy S1 (Sustainable Development Priorities) which outlines strategic priorities to deliver the Vision and address the key issues that have been identified in Mid Devon.

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<sup>67</sup> HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf) accessed 07/03/19

<sup>68</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://webarchive.nationalarchives.gov.uk/20170106161952/http://www.apho.org.uk/resource/item.aspx?RID=106106> accessed 07/03/19

<sup>69</sup> Health and Social Care Act 2012: <http://www.legislation.gov.uk/ukpga/2012/7/contents/enacted>

## Summary of current baseline

### Health indicators

The Health Profile for Mid Devon shows that there are only two health indicators in Mid Devon that perform significantly worse than the England average.<sup>70</sup> These indicators are:

- Diabetes diagnoses in people aged 17 and over.
- Dementia diagnoses in people aged 65 and over.

Conversely, there are ten health indicators in which Mid Devon performs significantly better than the England average. These indicators are:

- Life expectancy at birth (male).
- Life expectancy at birth (female).
- Under 75 mortality rate: all causes.
- Under 75 mortality rate: cardiovascular.
- Under 75 mortality rate: cancer.
- Alcohol-related harm hospital stays.
- Obese children (aged 10-11).
- Employment rate (aged 16-64).
- New sexually transmitted infections.
- New cases of tuberculosis.

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 under 'population and community'.

A total of 83.80% of residents in the Neighbourhood Plan area consider themselves to be in "very good" or "good" health, which is higher than the totals for Mid Devon (82.1%), the South West (81.4%) and England (81.4%).

Based on the 2011 census data, the majority of Silverton residents reported that their day-to-day activities are "not limited" by disability. The total percentage of residents within the Neighbourhood Plan Area who report that their activities are limited "a lot" by disability (6.29%) is lower than the district (7.45%), regional (8.26%) and national rate (8.30%).

In terms of access to local health services Wyndham House Surgery & Dispensary is located in the centre of the village.

### Green spaces

6.5 Good quality, accessible green space and infrastructure can provide many potential health and wellbeing benefits. The most significant of these can be grouped into three broad categories:

1. increased life expectancy and reduced health inequality;
2. improvements in levels of physical activity and health;
3. promotion of psychological health and mental well-being.

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<sup>70</sup> Gov.uk (2018) Local Authority Health Profiles [online] available at: <https://www.gov.uk/government/statistics/local-authority-health-profiles-2018>

- 6.6 The evidence strongly suggests that, at their best, green spaces can help reduce health inequalities and that both the improvement of existing, and creation of new, green infrastructure should be prioritised, especially in areas of greatest need.<sup>71</sup>
- 6.7 Local evidence suggests green spaces are limited in both Silverton village and Ellerhayes hamlet. The existing green space offer within and around the Neighbourhood Plan area includes:
- Ellerhayes play area includes a barrier of trees and an open grass area to the north.
  - Allotment space at the National Trust property at Killerton. This piece of land has been allocated to the residents and is located to the west of Ellerhayes.
  - The 'Little Rec' is an area of open green space to the south & east of the War Memorial which creates a feeling of openness when entering the area known as 'The Square'.
  - The Old Pond Site is a green lawn area, is on two levels divided by a steep slope and is adjacent to the junction of High Street and Silverdale (Silverton).
  - There is a football field on the eastern side of Silverton village, which alongside the, play-park, tennis court, skateboard areas, and open land provides a good sized green space for recreation and is known as 'The Rec'. Local evidence suggests that the oak tree at the top of this area is a real feature and has become the symbol of the village in many residents' eyes.
  - The churchyard is one of the largest open spaces within the Conservation Area, providing a setting for the Grade I Listed church.
  - The area to the south of the churchyard is known as 'The Berry', with two accessible areas of lawn.
  - Within the historic streetscape of Fore Street and High Street there are a number of small private gardens to the front of dwellings. These add colour and interest to the street. Notable gardens are to the front of 28 and 40 Fore Street and those in front of the terrace in High Street (numbers 11 - 41 odd).
  - The National Trust estate of Killerton is two miles from Silverton and half a mile from Ellerhayes and as well as beautiful gardens, the public are allowed to roam through its woodlands and across its parkland. The River Culm, a tributary to the Exe which runs through Killerton Estate, provides fishing and summer recreation for the parish.
  - Below Prispen House to the north east of the village of Silverton, there is what is believed to be an old stew pond (used for keeping live fish for eating) dating back to the 13th Century. It is currently used for recreational coarse fishing.

The specific green space offer of the Silverton Conservation Area is discussed in further detail within the Conservation Area Appraisal and Management Plan (2015). It is recognised that the open spaces discussed above add to the recreational offer of the village.

## Summary of future baseline

Broadly speaking, health and wellbeing in the Neighbourhood Plan area is favourable in comparison to the Mid Devon, regional and national averages. While positively planned development has the potential to maintain this trend, it is recognised that an ageing population has the potential to increase pressure on local facilities, particularly healthcare services.<sup>72</sup>

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<sup>71</sup> Forestry Research (2010) The benefits of Green Infrastructure [online] available at: <https://www.forestryresearch.gov.uk/tools-and-resources/urban-regeneration-and-greenspace-partnership/greenspace-in-practice/what-is-greenspacegreen-infrastructure-gi/> accessed 11/03/19

<sup>72</sup> 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/>

# Transportation

## Context review

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

Key messages from the National Planning Policy Framework<sup>73</sup> (NPPF) include:

*'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*The potential impacts of development on transport networks can be addressed*

*Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*

*Opportunities to promote walking, cycling and public transport use are identified and pursued*

*The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*

*Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*

*'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008.<sup>74</sup> The Devon and Torbay Local Transport Plan 3 (LTP3) 2011 – 2026 consists of three principle documents:<sup>75</sup>

- Transport Infrastructure Plan
- Devon and Torbay Strategy 2011 – 2026
- Devon's Implementation Plan

The LTP3 is a joint Plan for Devon and Torbay, reflecting an integrated and cross boundary approach to transport. It aims to deliver a transport system that can meet economic, environmental and social challenges. It also seeks to deliver the aspirations of Devon and Torbay Councils, stakeholders, businesses and the public. To achieve Devon and Torbay's vision the LTP3 has five key objectives:

- Deliver and support new development and economic growth;

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<sup>73</sup> MHCLG (2018) National Planning Policy Framework [online] available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728643/Revised\\_NPPF\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf) accessed 06/03/19

<sup>74</sup> Local Transport Act 2008 [online] available at: <http://www.legislation.gov.uk/ukpga/2008/26/contents> accessed 06/03/19

<sup>75</sup> Devon County Council (2011) Devon and Torbay Local Transport Plan 3 2011 – 2026 [online] available at: <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/> accessed 06/03/19

- 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 Mid Devon Core Strategy (2007) includes a number of policies which relate to the Transport SEA theme. Including:

- DM6 (Transport and Air Quality) (to be replaced with emerging Local Plan Review policy DM3 (Transport and Air Quality))
- DM8 (Parking) (to be replaced with emerging Local Plan Review policy DM5 (Parking))

## Summary of current baseline

### Rail network

There are no railway stations located within or in close proximity to the Neighbourhood Plan area. Cullompton, located approximately 7.5km north east once had a railway station which was closed in 1964. However, Network Rail is assessing the case for a new Cullompton Railway Station based on future housing predictions which are expected to put additional pressure on the transport network.

### Bus network

Buses to and from Silverton are supplied by Stagecoach and run in a circular route from Exeter to Tiverton. Some buses to and from Exeter call at St David's Railway Station, however this excludes Sundays and Bank holidays.

Buses from the Square run daily to Exeter (service 55A or B) from 6.56am and Exeter to Tiverton direct (service 155) from 8.06am. Throughout the day the intervals between buses fluctuate widely within the range of twenty minutes and two hourly on weekdays, and two hourly only at weekends and Bank holidays. The last bus leaves from the Square to Exeter at 22.16pm and to Tiverton at 23.11pm. Some of these buses also run a circular route around the village, from the Square, travelling through School Road, Coach Road and Wyndham Road, before returning to the Square.

The bus route stops at Silverton CoE Primary School on the edge of the settlement. This provides good access for both residents and pupils travelling from outside the village (which may reduce the dependency on cars in the village around peak school hours), although the service is mainly used by commuters, students and, after 9.30am, pensioners.

The direct bus (service 155), using the A396 main road to and from Exeter and Tiverton stops at the Silverton junction at the bottom of Upexe Hill. This entails passengers having to walk up or down the lane (no pavement) a distance of just under a mile. These buses are also accessible for those living in the Burn and Chitterley areas. Subsidised bus fares are available for the disabled, students, and pensioners. The contract for this is in place till 2020.

Access to public transport is limited for those living at Ellerhayes. There is no direct access given no buses run through Ellerhayes.

### Cycle and footpath network

Local evidence suggests the Public Rights of Way (PRoW) and permissive paths in the Neighbourhood Plan area are well used and popular.<sup>76</sup> Most of them are used very regularly by locals, notably dog walkers and hikers. The PRoW network is an important asset for residents looking to access the countryside, creating a green link between lanes and roads.

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<sup>76</sup> Silverton Parish Council (2018) Silverton Parish Neighbourhood Plan



There are a number of permissive footpaths available for use by residents.

However, the current PRow network is seen to hold many inadequacies at present. The roads accessing the village have partial or no footpaths, making them particularly hazardous for pedestrians. The Silverton Health Walks Group, 'Walk & Talk', reports that the *"limited number of safe public footpaths in the parish severely restricts the choice and variety of the walks. Many of the paths do not link with each other."*<sup>77</sup>

Silverton village has a well-supported cycle club. The lanes around the Parish and particularly the steep incline of Old Butterleigh Road to Criss Cross are regularly used by recreational as well as competitive cyclists as a training route. It is recognised that cyclists utilise local lanes, and that the provision of a cycle path/track would make cycling more accessible for residents.

Silverton village streets and the lanes around the Parish are regularly used by horse riders. There are no official bridle paths. Local residents indicate that the addition of designated bridle paths would be an asset to the area.

## Road network and congestion

Silverton is an ancient village and the surrounding roads reflect this. The main traffic route into the village of Silverton is from Upexe Hill which, to the west, joins the A396 Valley road running between Exeter and Tiverton. Upexe Hill is used by service buses and a substantial number of heavy goods vehicles and farm vehicles accessing or passing through the village (the Neighbourhood Plan area has A-road access to the M5 within approximately 20 minutes' drive).

Upexe Hill, although on the whole wide enough for passing cars, relies on a small number of passing places for larger vehicles. This road passes through the village Square, bisecting the old part of the village and exits to the east into School Road, Park Road and out of the Parish towards Bradninch and Cullompton, Killerton and Exeter.

School Road from the Square is also initially narrow and for much of the length there is no pavement. With the heavy traffic using the road this causes safety concerns. At the lower end of School Road there is access into Coach Road which is part of the bus route around the village. At the end of this road is the village primary school and the turn into Wyndham Road, a housing estate built in the 1970's. These roads are relatively wide for the free flow of traffic, although the on-road parking, traffic accessing the school and the movement of the buses regularly cause congestion.

Overall access to the main roads from the village is therefore very tight and road safety is a concern. As discussed above, all exits from the village are constrained and road conditions are poor, particularly the main road running from Silverton to Cullompton (School Road, Park Road, Ellerhayes). Road congestion at these locations is a key issue.

## Car ownership

Based on the 2011 census data, 87.25% of households in the Neighbourhood Plan Area own at least one car or van, which is higher than the percentage for Mid Devon (85.66%), the South West (81.1%) and England (74%). Silverton has a higher percentage of households with access to two or more vehicles than the district, regional and national totals, indicating a strong reliance on private vehicles in the Neighbourhood Plan area.

## Travel to work

The most popular method of travelling to work in the plan area is by car or van (47.49%), which is higher than the proportions for Mid Devon (44.25%), the South west (41.39%) and England (37%).

The percentage of people that work from home in Silverton Parish (6.6%) is slightly lower than for Mid Devon (7.31%), but higher than that for the South West (4.62%) and England (3%).

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<sup>77</sup> P. Kidds on behalf of Walk & Talk Silverton (2016)

Finally, there is a lower percentage of people that walk, bike, or use a train, bus, minibus or coach to travel to work in the plan area (8.6%), than the Mid Devon District (12.6%), the South West (15.57%) and England (19.6%).

## Summary of future baseline

An increase in the village population may put a strain on accessibility, with larger vehicles having difficulties in approaching and leaving the village using the current main access route.

Silverton currently has a less than adequate bus service (supplied by Stagecoach and supplemented by services available from the TDCTA). A useful addition to this service would be a public bus link with Cullompton. An increase in the village population would put further strain on the service as it is now.

Car ownership in Silverton is high and the majority of residents rely on their cars for commuting to work. It is unlikely that modest development in Silverton would be sufficient to support new provision of public transport services within the Neighbourhood Plan area. Reliance on the car is therefore likely to continue.

