



Strategic Environmental Assessment for the Malborough Neighbourhood Plan

Environmental Report to accompany the submission
version of the Neighbourhood Plan

Addendum

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Quality information

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1. Introduction

This document is an addendum to the Strategic Environmental Assessment (SEA) Environmental Report submitted with the Malborough Neighbourhood Plan in summer 2018. The addendum has been prepared in response to questions raised by the Independent Examiner in an email sent to South Hams District Council on 5th September 2018.

The addendum presents a number of updates to the Environmental Report. This is with a view to supporting Independent Examination through providing additional clarity on the information and findings presented in the Environmental Report, including relating to potential impacts on European and nationally designated biodiversity sites, the South Devon AONB and the historic environment.

This addendum is structured as follows:

- **Chapter 2** presents updates to the assessment of reasonable alternatives presented in Table 4.1 in the Environmental Report.
- **Chapter 3** presents updates to the site assessment findings presented in Table 4.2-4.8 in the Environmental Report.
- **Chapter 4** presents updates to the overall assessment findings and summaries presented in Section 5.3 and Section 5.5 of the Environmental Report.

Appendix A of this addendum subsequently provides a revised Non-Technical Summary to reflect the updates made to the findings of the SEA.

2. Updates to the assessment of broad options (Table 4.1)

Minor revisions have been made to the assessment of the three initial options assessed in **Section 4.3.1** of the Environmental Report. These revisions present additional information on the potential for impacts on the internationally and nationally designated nature conservation sites in the vicinity of the Neighbourhood Plan area, and impacts on the South Devon AONB.

In this context the following table updates and replaces **Table 4.1** in the Environmental Report. Deletions to the previous text are provided as a ~~strikethrough~~, and additions underlined in red.

Updated Table 4.1: Appraisal findings: reasonable alternatives linked to overall housing numbers

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Biodiversity and geodiversity	<p>In terms of the biodiversity constraints present in the Neighbourhood Plan area, the north east of the parish is within an IRZ for 'Residential development of 50 units or more' for the Salcombe to Kingsbridge Estuary SSSI. As such, Option 3 through delivering a level of growth above the 50 dwelling threshold, has the potential to lead to adverse effects on this nationally designated site. This includes through recreational pressures and disturbance. The area towards the centre of the Neighbourhood Plan area, near Malborough village, is within the IRZ for 'Residential development of 100 units or more' for the Salcombe to Kingsbridge Estuary SSSI. In this context, only Option 3 has the potential to deliver growth at this level, with the potential for increased adverse effects on the SSSI. <u>In addition, given a small part of the SSSI is covered by the South Devon Shore Dock SAC, the increased level of development proposed through Option 3 has an increased likelihood of impacts on this internationally designated site.</u></p> <p>Effects on local biodiversity assets in the Neighbourhood Plan area (Local Wildlife Sites, BAP Priority Habitats, etc.) have the potential to take place under all of the options, including through habitat loss and direct and indirect impacts on species and ecological networks. These effects are likely to be increased through the delivery of a higher level of housing in the Neighbourhood Plan area. As such Option 3 has the potential to lead to an increased magnitude of effects on biodiversity assets locally.</p> <p>Conversely, a larger scale of housing delivery may increase opportunities for biodiversity enhancements, such as green infrastructure improvements and enhancements to ecological networks through developer led contributions. In this context opportunities for biodiversity enhancement/improvements are likely to be more limited through the lower level of growth promoted through Option 1.</p> <p>All allocations have the potential to have impacts on biodiversity assets if located inappropriately and have poor design and layout. Likewise all allocations have the potential to promote net gains in biodiversity value. As such, for all sites the potential effects on biodiversity depends on elements such as the provision of green infrastructure to accompany new development areas and the retention and incorporation of biodiversity features.</p>	1	2	3

Option 1: Delivery of the minimum number of dwellings to meet the indicative housing requirement for the JLP (i.e. delivery of no further dwellings over and above the 10 minimum required)

Option 2: Delivery of up to c.50 additional dwellings over the JLP indicative housing number through the Malborough Neighbourhood Plan

Option 3: Delivery of over c.50 additional dwellings through the Malborough Neighbourhood Plan

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Climatic factors	<p>In terms of climate change mitigation, the options which facilitate an increased level of development (Option 3, and to a lesser extent, Option 2) will lead to an increased level of greenhouse gas emissions due to an enlarged built footprint of the Neighbourhood Plan area.</p> <p>Option 3, through facilitating larger scale sites, may however enable more effective improvements to walking and cycling and public transport links through the infrastructure opportunities afforded by larger allocations. Overall however, Option 3 is likely to lead to the largest increases in emissions of the options through facilitating additional growth.</p> <p>In terms of climate change adaptation, enhancements to the Neighbourhood Plan area's green infrastructure networks will be a key means of helping the plan area adapt to the effects of climate change. This includes through helping to regulate extreme temperatures and surface water run-off. In this context the direct provision of green infrastructure improvements to accompany new development areas may be more achievable through Options 2 and 3, including through mechanisms such as the community infrastructure levy.</p>	1	2	3
Landscape and historic environment	<p>The whole of the Neighbourhood Plan area is located within South Devon AONB. As such all development in the parish has the potential to impact the special qualities or distinctive landscape character of the AONB without appropriate design and layout. The Neighbourhood Plan area also has a rich historic environment, as highlighted by the numerous listed buildings, scheduled monuments, and the presence of the Malborough Conservation Area.</p> <p>All options have the potential to lead to impacts on the landscape character of the AONB and the setting of the historic environment. However, through increasing the scale of development to be taken forward for the purposes of the Neighbourhood Plan, Option 3 has increased potential to lead to adverse effects. This includes through loss of landscape features, visual impacts and impacts on noise quality linked to increased traffic flows. In this context Option 1, through promoting a limited scale of development, is less likely to lead to significant effects on landscape and townscape character. <u>Given the scale of development proposed under these options, development taken forward through both Options 2 and 3 is likely to require allocations which constitute 'major development' in relation to the provisions of the NPPF (i.e. sites defined as ten or more homes).</u></p> <p><u>Whilst Options 2 and 3 increase opportunities for supporting the reuse and rejuvenation of existing heritage assets in the Neighbourhood Plan area, this will support the parish's historic environment resource, if high quality design and layout is incorporated within new provision. Option 2 however provides more of a balance between providing opportunities to rejuvenate existing underutilised heritage assets and protecting landscape character, visual amenity and the setting of the historic environment. the scales of development proposed through these options have increased potential to lead to adverse effects on the fabric and setting of historic environment assets. This is particularly given housing delivery through these options is likely to require the taking forward of major development sites.</u></p>	1	4 2	3

Option 1: Delivery of the minimum number of dwellings to meet the indicative housing requirement for the JLP (i.e. delivery of no further dwellings over and above the 10 minimum required)

Option 2: Delivery of up to c.50 additional dwellings over the JLP indicative housing number through the Malborough Neighbourhood Plan

Option 3: Delivery of over c.50 additional dwellings through the Malborough Neighbourhood Plan

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Population and community	<p>In terms of affordable housing, such provision may be easier to deliver through the allocations delivered through Option 2 and Option 3. Whilst all new developments involving one or more dwellings are liable for the community infrastructure levy, concentrating the delivery of housing at larger sites may help enable the securing of additional contributions to site specific mitigation through Section 106 planning agreements (it should be noted however that such contributions are typically required to make a development proposal acceptable in planning terms that would not otherwise be acceptable). Recent legislation has introduced a 10 unit threshold for affordable housing contributions. However, within AONBs, the exemptions would apply only to developments not exceeding 5 new homes; developments of 6 to 10 homes could pay a commuted sum, either at or after completion of the development. As such, all options provide opportunity for delivering affordable housing in the parish and contributing towards meeting local housing needs.</p> <p>In terms of the provision of services and facilities, the delivery of CIL monies and similar mechanisms are likely to be more achievable through the larger scale allocations facilitated through Options 2 and 3. Similarly potential enhancements to the vitality of the village provided by an increased population growth through these options may support the availability and viability of services, facilities, amenities, and public transport links. Conversely however, larger scale development proposed under Option 3 may affect the setting and character of the area, increasing pressure on local services and the local transport network.</p> <p>Taking the above into consideration, Option 2 is likely to provide the level of growth to facilitate housing delivery which will meet Malborough's local needs, support existing services, facilities, and community vitality, whilst also enabling the impact of growth to be managed.</p>	3	1	2
Health and wellbeing	<p>The delivery of housing provision through larger scale allocations has the potential to concentrate effects on road safety and noise quality from increased traffic flows at certain locations. This may have effects on the health and wellbeing of residents. Impacts however depend on the location of new development areas and the integration of elements such as sustainable transport and green infrastructure provision.</p>	1	2	3

Option 1: Delivery of the minimum number of dwellings to meet the indicative housing requirement for the JLP (i.e. delivery of no further dwellings over and above the 10 minimum required)

Option 2: Delivery of up to c.50 additional dwellings over the JLP indicative housing number through the Malborough Neighbourhood Plan

Option 3: Delivery of over c.50 additional dwellings through the Malborough Neighbourhood Plan

SEA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		Opt 1	Opt 2	Opt 3
Transportation	<p>The provision of new and improved sustainable transport infrastructure to accompany new housing development, including pedestrian/cycle and public transport links may be more feasible with the larger scale of development proposed through Option 3, and to a lesser extent through Option 2. This is a key consideration given the limited access to public transport in the village and the high reliance on the car.</p> <p>Through promoting smaller scale housing provision across the plan area, Options 1 and 2 have increased potential to facilitate the development of new housing at locations which are more integrated with the existing built up area of Malborough. This has the potential to allow at some locations easier access to the village's services and facilities and public transport links by sustainable modes of transport such as walking and cycling. In this context, the provision of an increased level of housing has the potential to increase existing congestion issues in the village. This is significant given the limited capacity of the road network in Malborough, with narrow roads and significant parish congestion hot spots (such as Cumber Close and Collaton Road) in the Neighbourhood Plan area.</p>	3	1	2

3. Updated site assessment findings (Tables 4.2 to 4.6).

A number of updates have been made to the site assessment findings presented in **Section 4.3.2** of the Environmental Report. These updates have been made to provide additional clarity on the potential for impacts on internationally and nationally designated biodiversity sites in the vicinity of the Neighbourhood Plan area, the South Devon AONB and the setting of the historic environment.

The following tables update and replace **Tables 4.2 to Table 4.6** in the Environmental Report. Deletions to the previous text are provided as a ~~strikethrough~~, and additions underlined in red.

Table 3.1: Site A, Wallfield

SEA theme	Commentary, Site A: Wallfield
Biodiversity and geodiversity	<p>No significant biodiversity constraints are present on the site. The site is within a SSSI Impact Risk Zone for <i>'residential development of 100 or more houses outside existing settlements/urban areas'</i>, however as the site's capacity is significantly less than 100 dwellings, the risk to the designated site is removed.</p> <p>There are no County Wildlife Sites present on or in close proximity to the site and the site is not within a Strategic Nature Area.</p> <p>In terms of habitats, no Biodiversity Action Plan priority habitats are present on or adjacent to the site.</p>
Climatic factors	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p> <p>In terms of sustainable transport, a public footpath runs along the west of the site, connecting to the wider PRoW network. There is the potential to facilitate pedestrian/cycle access to the village centre via this route. However, there are no bus stops within close proximity to the site and the A381 road provides a barrier to pedestrians. Additional vehicular use along this road would likely lead to an increase in greenhouse gas emissions.</p>
Landscape and historic environment	<p>The site is located within the South Devon Area of Outstanding Natural Beauty (AONB).</p> <p>The site is relatively detached from the village located along the A381 and is a visually prominent and elevated south facing site. At 100m in elevation the site is higher than all areas east to the Kingsbridge Estuary and north east to Kingsbridge, which affords wide landscape views into the site. As such development at this location, which would constitute a 'major development' with regards to the provisions of the NPPF, would detract from views within the unbuilt up part of the AONB, having adverse effects on the character and special qualities of the AONB. Development would also adversely impact the scenic value of the footpath along the west of the site, changing views from open rural landscape to built urban form.</p> <p>There are no sites of historic interest within or adjacent to the site. Considering the elevation of the site, development may have a visual impact on the setting of the Grade I listed All Saints' Church to the southwest.</p>
Population and community	<p>At 2ha, the site has the potential to deliver a significant number of homes, likely in excess of the number promoted through the Malborough Neighbourhood Plan (<49 dwellings).</p> <p>The site is disconnected from the existing village centre, having a negative effect on community cohesion. The site is considered to be at some distance from the majority of existing services and facilities in the village, however the post office in the west is located approximately 620m from the site, The site also has poor access to public transport links given its distance from bus stops in the village (although a PRoW runs along the west of the site).</p>

SEA theme	Commentary, Site A: Wallfield	
Health and wellbeing	The site is located approximately 650m from the village playing fields and village hall. In terms of access to health services and facilities, the closest GP surgery is Redfern Health Centre, in Salcombe, 2.6 miles from the site. Residents are able to access Salcombe via the 606 bus service which runs hourly from Malborough (however the bus stop for this service is 650m from the site). As this is not a frequent service, and residents cannot easily access the bus stop from the site, there is likely to be a heavy reliance on the car to access health facilities.	
Transportation	The site is 650m from the nearest bus stop, which provides links to Salcombe via the 606 service. The 162 route to Hope (via Thurlestone) also operates in the village; however both are not frequent, running hourly or less. As such, there is likely to be a heavy dependency on the car for travel, particularly given the distance of the site to local bus stops.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.3: Site B, Portlemore Downs

SEA theme	Commentary, Site B: Portlemore Downs	
Biodiversity and geodiversity	No significant biodiversity constraints are present on the site. The site is not within an SSSI Impact Risk Zone, nor Strategic Nature Area. This includes Impact Risk Zones for the part of the Bolt Head to Bolt Tail SSSI which is covered by the South Devon Shore Dock SAC. West Portlemouth County Wildlife Site is located 250m to the southwest of the site. In terms of habitats, no Biodiversity Action Plan priority habitats are present on or adjacent to the site and the site does not hold significant biodiversity interest.	
Climatic factors	Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village, although these are unlikely to be significant. In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding. The site is located close to the centre of the village and village amenities and local bus routes. This will support the use of sustainable modes of transport, reducing reliance on the car. This will help limit per capita emissions.	

SEA theme	Commentary, Site B: Portlemore Downs	
Landscape and historic environment	<p>The site is located within the South Devon AONB.</p> <p>The site is on the settlement edge, and has the potential to lead to adverse effects on the character and special qualities of the AONB <u>and Heritage Coast</u>, considering its south-facing hillside setting. Development at this location, <u>which would constitute a 'major development' with regards to the provisions of the NPPF</u>, would likely detract from views, impacting on the southern boundary between the built up part of the village and open countryside. Development may also set precedent for further growth of the settlement to the southeast.</p> <p>Development on the western section of the site is likely to be less <u>have less impact on wider landscape character</u> due to its proximity to existing development and the field boundary acts <u>acting</u> as a barrier between developed land and open countryside. However the potential for adverse effects on landscape character remains.</p> <p>There are no sites of historic interest within or within the <u>immediate</u> setting of the site, <u>including sites listed on the Historic Environment Record</u>.</p>	
Population and community	<p>Development of the site will deliver a maximum of 49 homes, helping to meet the local housing need.</p> <p>The site has good access to the village centre, village amenities and local bus route to Salcombe. This will support access to services and facilities.</p>	
Health and wellbeing	<p>The site is located approximately 300m from the village playing fields and village hall. In terms of access to health services and facilities, the closest GP surgery is Redfern Health Centre, in Salcombe, 2.5 miles from the site. Residents are able to access Salcombe via the 606 bus service which runs hourly from Malborough (accessible from the bus stop on Cumber road). However, as this is not a frequent service, it is thought that there may be some reliance on the car to access health facilities.</p>	
Transportation	<p>The site has good access to the village centre, and is located approximately 300m from the nearest bus stop which provides links to Salcombe via the 606 service. The 162 route to Hope (via Thurlestone) also operates in the village; however both are not frequent, running hourly or less. As such, there may be some dependency on the car for travel. Consideration for increased traffic on Collaton Road must be given, particularly along the blind corner from Portlemore Lane.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.4: Site C, Great Park, Withmore Downs

SEA theme	Commentary, Site C: Great Park, Withmore Downs
Biodiversity and geodiversity	<p>No significant biodiversity constraints are present on the site. The site is not within an SSSI Impact Risk Zone, nor a Strategic Nature Area. <u>This includes Impact Risk Zones for the part of the Bolt Head to Bolt Tail SSSI which is covered by the South Devon Shore Dock SAC.</u> West Portlemouth County Wildlife Site is located 350m to the southeast of the site.</p> <p>In terms of habitats, no Biodiversity Action Plan priority habitats are present on or adjacent to the site and the site does not hold significant biodiversity interest.</p>
Climatic factors	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p> <p>At its furthest point, the site is considerably distant from the village centre, however as the eastern section of the site is significantly closer. The eastern section of the site also has good access to the 162 local bus route to Hope, however is approximately 500m from the more frequent 606 bus service which runs to Salcombe.</p>
Landscape and historic environment	<p>The site is located within the South Devon AONB.</p> <p>The site is south facing and prominent in the landscape extending from the existing settlement to the northeast. Development, <u>which would constitute a 'major development' with regards to the provisions of the NPPF,</u> therefore has the potential to lead to impacts on the landscape character and special qualities of the AONB.</p> <p>There are no sites of historic interest within or within the setting of the site.</p>
Population and community	<p>At 3.86ha, the site has the potential to deliver a significant number of homes, in excess of the number promoted through the Malborough Neighbourhood Plan (<49 dwellings). This will contribute positively towards meeting local housing needs.</p> <p>The eastern part of the site is within an acceptable distance to the village centre, its services and facilities. The eastern section of the site also has good access to the 162 local bus route to Hope, however is approximately 500m from the more frequent 606 bus service which runs to Salcombe.</p>
Health and wellbeing	<p>The site is located approximately 500m from the village playing fields and village hall, however there are alternative recreational spaces in closer proximity to the site, including The Green/The Pound and allotment space. In terms of access to health services and facilities, the closest GP surgery is Redfern Health Centre, in Salcombe, 2.5 miles from the site. Residents are able to access Salcombe via the 606 bus service which runs hourly from Malborough (however the bus stop for this service is approximately 500m from the site). As this is not a frequent service, it is thought that there may be some reliance on the car to access health facilities.</p>
Transportation	<p>The eastern part of the site is within an acceptable distance to the village centre, its services and facilities. The eastern section of the site also has good access to the 162 local bus route to Hope, however is approximately 500m from the more frequent 606 bus service which runs to Salcombe. Given its location, there will continue to be an elevated degree of car dependency from housing provision at the site.</p>
<p>Key</p>	

SEA theme	Commentary, Site C: Great Park, Withymore Downs	
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.5: Site D, Field Behind Church, Withymore Farm

SEA theme	Commentary, Site D: Field Behind Church, Withymore Farm	
Biodiversity and geodiversity	<p>No significant biodiversity constraints are present on the site. The site is not within an SSSI Impact Risk Zone, no County Wildlife Sites are present on or in close proximity to the site and the site is not within a Strategic Nature Area.</p> <p>In terms of habitats, no Biodiversity Action Plan priority habitats are present on or adjacent to the site.</p>	
Climatic factors	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding, however there is a small area at low risk of surface water flooding in the north of the site.</p> <p>The site is well located to access the village centre, its services and facilities. The site also has good access to the 162 and 606 local bus services which run to Hope and Salcombe. This will support the use of sustainable modes of transport, reducing reliance on the car and helping to limit per capita emissions.</p>	
Landscape and historic environment	<p>The site is located within the South Devon AONB.</p> <p>Development of the site is expected to have visual impact given the extension of the settlement into the rural landscape to the northwest of the village. Depending on design and layout, this has the potential result in adverse effect on the character of the sensitive landscape.</p> <p>Development, <u>which would constitute a 'major development' with regards to the provisions of the NPPF</u>, would also potentially adversely impact on views from footpath which runs from the southwestern boundary of the site, changing views from open rural landscape to built urban form.</p> <p>The Malborough Conservation Area is located adjacent to the site to the south, and therefore development has the potential to adversely impact on its setting.</p> <p>Considering the elevation of the site, development may have a visual impact on the setting of the Grade I listed All Saints' Church to the south.</p>	
Population and community	<p>Allocation of the site will contribute positively towards meeting local housing needs.</p> <p>The site is well located to access the village centre, its services and facilities. The site also has good access to the 162 and 606 local bus services which run to Hope and Salcombe. This will support accessibility to services and facilities.</p>	
Health and wellbeing	<p>The site is located approximately 380m from the village playing fields and village hall. In terms of access to health services and facilities, the closest GP surgery is Redfern Health Centre, in Salcombe, 2.5 miles from the site. Residents are able to access Salcombe via the 606 bus service which runs hourly from Malborough. As this is not a frequent service, it is thought that there may be some reliance on the car to access health facilities.</p>	

SEA theme	Commentary, Site D: Field Behind Church, Withymore Farm	
Transportation	<p>The site is located close to the centre of the village and village amenities and local bus routes. The site is also connected to the PRoW network. This will support the use of sustainable modes of transport.</p> <p>It is noted that access to the site would be from Luckhams Lane, which is severely constrained at both ends.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 4.6: Site E, Eastacombes, (S.Huish Parish)

SEA theme	Commentary, Site E: Eastacombes, (S.Huish Parish)	
Biodiversity and geodiversity	<p>No significant biodiversity constraints are present on the site. The site is not within an SSSI Impact Risk Zone, no County Wildlife Sites are present on or in close proximity to the site and the site is not within a Strategic Nature Area.</p> <p>In terms of habitats, no Biodiversity Action Plan priority habitats are present on or adjacent to the site.</p>	
Climatic factors	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village, although these are unlikely to be significant.</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial flooding, however there is a small area at low risk of surface water flooding along the western site boundary.</p> <p>The site is at the outer limits of acceptable walking distance to the village services and facilities in the village centre. The site has good access to the 162 local bus route to Hope, however is approximately 500m from the more frequent 606 bus service which runs to Salcombe.</p>	
Landscape and historic environment	<p>The site is located within the South Devon AONB.</p> <p>Development of the site, <u>which would constitute a 'major development' with regards to the provisions of the NPPF</u>, is expected to have significant visual impact, considering the site is detached from the existing settlement in the open rural landscape, and elevated. The site is likely to be visible from the settlement to the south and also the A381 and residential dwellings to the east. Development is therefore likely to lead to detrimental impact on the character of the sensitive landscape, with potential adverse effect on the special qualities of the AONB.</p> <p>Development would also adversely impact the scenic value of the footpath which runs along the eastern boundary of the site, changing views from open rural landscape to built urban form.</p> <p>There are no sites of historic interest within or adjacent to the site. Considering the elevation of the site, development may have a visual impact on the setting of the Grade I listed All Saints' Church to the south.</p>	

SEA theme	Commentary, Site E: Eastacombes, (S.Huish Parish)	
Population and community	<p>This site has the potential to deliver a significant number of homes, likely in excess of the number promoted through the Neighbourhood Plan (<49 dwellings). The site is located outside of the parish, and is at the outer limits of acceptable walking distance to the village services and facilities. The site has good access to the 162 local bus route to Hope, however is approximately 500m from the more frequent 606 bus service which runs to Salcombe. While it is recognised that this will support accessibility to services and facilities, it is also likely that there may be some reliance on the car.</p>	
Health and wellbeing	<p>The site is located approximately approximately 500m from the village playing fields and village hall, however there are alternative recreational spaces in closer proximity to the site, including The Green/The Pound and allotment space. In terms of access to health services and facilities, the closest GP surgery is Redfern Health Centre, in Salcombe, 2.5 miles from the site. Residents are able to access Salcombe via the 606 bus service which runs hourly from Malborough (however the bus stop for this service is approximately 500m from the site). As this is not a frequent service, it is thought that there may be some reliance on the car to access health facilities.</p>	
Transportation	<p>The site is located outside of the parish, at the outer limits of acceptable walking distance to the village services and facilities. The site has good access to the 162 local bus route to Hope, however is approximately 500m from the more frequent 606 bus service which runs to Salcombe. The site is also connected to the PRow network. While it is recognised that this will support accessibility to services and facilities, it is also likely that there may be some reliance on the car for travel.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

4. Updates to summary appraisal findings (Section 5.3)

Updates have also been made to the key findings presented in **Chapter 5** under the biodiversity and geodiversity and landscape and historic environment themes (**Section 5.3** and **Section 5.5** of the Environmental Report). In addition updates have been made to the summary of the assessment findings presented in **Section 5.9**.

The updated sections are presented below. Deletions to the previous text are provided as a ~~strikethrough~~, and additions underlined in red.

Updated Section 5.3: Biodiversity and geodiversity

~~There are no European Designated Sites present within the Neighbourhood Plan area, however the nationally designated Bolt Head to Bolt Tail Site of Special Scientific Interest (SSSI) located along the Neighbourhood Plan area's southern boundary. The proposed housing allocation is not within the SSSI Impact Risk Zone for this site for the type of development proposed. As such the allocation is unlikely to lead to impacts on the status of the SSSI.~~

There is a part of a European designated nature conservation site present within the Neighbourhood Plan area. Located at Soar Mill Cove, and covering approximately 1.5ha, this comprises a small part of the 332.12ha South Devon Shore Dock SAC. This comprises part of the area also nationally designated as the Bolt Head to Bolt Tail SSSI, which is located along the whole of the Neighbourhood Plan area's southern coastline. The majority of the SSSI within the Neighbourhood Plan area is in a 'favourable' condition, with the remaining 20% of the SSSI in an 'unfavourable recovering' condition.

In terms of the proposed allocations taken forward through the Neighbourhood Plan, these are located approximately 2.4km to the north east of the SSSI and SAC. Significantly, they are not located within the Impact Risk Zone for the SSSI for the type or scale of development proposed through the Neighbourhood Plan. This includes for the part of the SSSI which is covered the South Devon Shore Dock SAC. As such, the allocation and reserve allocations are unlikely to lead to impacts on the status of the SAC or SSSI.

Just outside of the Neighbourhood Plan area is the 651.5ha Salcombe to Kingsbridge Estuary SSSI, located adjacent to the south east boundary of the Neighbourhood Plan area at its closest point. The north east of the Neighbourhood Plan area is within an IRZ for 'Residential development of 50 units or more' for the Salcombe to Kingsbridge Estuary SSSI. The area towards the centre of the Neighbourhood Plan area, near Malborough village, is within the IRZ for 'Residential development of 100 units or more' for the Salcombe to Kingsbridge Estuary SSSI. The site allocation, Portlemore Downs, is allocated for a maximum of 49 units, and therefore is not therefore expected to have a significant adverse effect on the designated site.

The Neighbourhood Plan area also contains locally designated sites and a variety of BAP Priority Habitats and Species. The current version of the Malborough Neighbourhood Plan sets out a range of provisions to limit the impacts of development on features and areas of biodiversity interest, and to support enhancements to ecological networks within the Neighbourhood Plan area. Policy 26 (Biodiversity) states that proposals which result in a loss of biodiversity will not normally be permitted. The policy recognises the need for development to restore, conserve and/or enhance the special qualities of the area, including its wildlife habitats, corridors and any other features of ecological interest including those related to protected species.

The incorporation of biodiversity features into building and landscape is further supported through Policy 7 (High Quality Design) and Policy 8 (Retail and Commercial Frontages). These policies focus on the design and layout of development, ensuring the important layout characteristics of the area, such as trees and vegetation are retained and improved. This has a positive effect on biodiversity and overall townscape composition. Policy 25 (Trees, Woodlands, Hedgerows, and Devon Banks) further prevents loss, and encourages the net-gain, of habitats which make a significant contribution to

environmental quality and nature conservation. Hedgerows in particular have important connectivity value, supporting biodiversity corridors and ecological networks throughout the Neighbourhood Plan area.

Policy 27 (Local Green Space Designation) stipulates that in line with the National Planning Policy Framework (2012) (para 77), for an area to be allocated as Local Green Space, one of the criteria it must meet is to hold a local significance because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife. This therefore enables the parish to protect local areas of wildlife value by designation as a Local Green Space. For example, Malborough Playing Fields Local Green Space includes a Community Wood which is of intrinsic value providing amenity space, biodiversity richness, and ecosystem services. In this context the policy designates six areas as Local Green Space. Policy 28 (Protection of Green Spaces), ensures the loss of (or damage to) Local Green Spaces is only permitted in exceptional circumstances, ensuring no adverse effect on the environmental, social or economic significance of the Neighbourhood Plan area. This will support the Neighbourhood Plan area's biodiversity networks.

Updated Section 5.5: Landscape and Historic Environment

The Malborough Neighbourhood Plan area sits on a 400ft plateau, and coast has gained national recognition as a designated Heritage Coast. The Neighbourhood Plan area is also wholly located within South Devon AONB. The value of the landscape is reinforced by the AONB Management Plan and characterised by the South Devon AONB & SHDC 2007 Landscape Character Assessment. In terms of heritage assets there are numerous features of historic environment interest throughout the Neighbourhood Plan area, including 40 listed buildings, ten scheduled monuments, and a Conservation Area which covers the village centre.

Protecting the environment is of paramount importance to local residents, and as such a number of policies proposed for the Malborough Neighbourhood Plan focus on protecting and enhancing landscape and townscape quality in the Plan area, and supporting the conservation and enhancement of the historic environment. Policy 21 (Siting of Development) seeks to secure and protect the rural nature of the parish, stating that development will not be permitted where there may be significant detrimental effect on the character of the countryside. I.e. the Neighbourhood Plan provides for a presumption *against* development in the open countryside rather than the presumption *in favour* of sustainable development. The policy seeks to retain the settlement pattern of the rural hamlets Soar, Bolberry, Combe, Rew, Collaton and Ilton, conserving characteristic features of the landscape that contribute towards the overarching beauty of the parish. This is reiterated through Policies 7 (High Quality Design) and 25 (Trees, Woodland, Hedgerows and Devon Banks), which support the protection of landscape character and settlement patterns through development design.

The Neighbourhood Plan recognises that all development will be within the AONB, and requests through Policy 7 (High Quality Design) that new proposals retain and maximise all neighbours' views and the views of existing housing. Policy 39 (Design of Employment Sites) further states that rural business initiatives will only be supported where these maintain or enhance the special qualities or distinctive landscape character of the AONB. It is noted that there is no individual policy relating to the landscape and/or the South Devon AONB within the Malborough Neighbourhood Plan. Given the significance of the designation at a national scale, and that it covers the entirety of the Plan area, a tailored policy would likely provide additional protection for the AONB. However it is also noted that, given the national policy provisions for the AONB, and the provisions of the AONB Management Plan, landscape character in the AONB will nonetheless be provided with a significant degree of protection, particularly when combined with the other policies of the Neighbourhood Plan.

Villagescape and the integrity of the historic environment are also addressed through the Neighbourhood Plan policies that support high quality design and layout. Policy 36 (Employment and Enterprise) requires that development contributes to the character and vitality of the local area; responding well to its local context, reinforcing local distinctiveness and not detracting from the community. Policy 24 (Heritage) considers the historic core of Malborough, given the 53 assets the

Plan area has registered with Historic England. The policy requires development to pay special regard for the need to conserve and enhance assets and their settings, and include mitigation and/or compensation where there may be any loss of heritage value. This is reiterated through design policies within the Neighbourhood Plan such as Policy 7 (High Quality Design), which encourages well designed streetscapes, and sustainable design and construction that respond to the heritage value of the site. This will contribute towards ensuring that new development is related to the existing settlement and is also in keeping with surrounding residential properties, having a positive effect on local villagescape. It is also noted that a Heritage and Conservation Assessment & Management Plan will be undertaken of the condition and vulnerability of the local historic environment to help identify any future management action and inform development.

Policy 31 (Reinforce the Character and Quality of Malborough) seeks to enhance the community enjoyment of green space; contributing to improved character of the land through new planting, improvements to walls, etc. Through supporting the ongoing protection and enhancement of high quality multifunctional green infrastructure networks in the Neighbourhood Plan area, the policy will protect and enhance landscape character and the setting of the historic environment, and support enhancements to the public realm.

Additional policies with the potential to support landscape/villagescape character and the historic environment include Policy 8 (Retail and Commercial Frontages). This policy seeks to ensure that new/renovated retail and commercial frontages are sympathetic to the character of the local environment in which they are situated, and compliment the architectural design of the rest of the building where that building has historic or architectural merit. Policy 19 (Retrofitting Historic/Listed Buildings) also focuses on safeguarding the special characteristics of heritage assets for the future. The policy encourages the sensitive retrofitting of energy efficiency measures in historic buildings where in line with current guidance from Historic England.

In terms of the allocated site [at](#) Portlemore Downs, the site is located on the edge of the settlement with long distance views out of the site to the south. The site, [which would constitute a 'major development' with regards to the provisions of the NPPF](#), will likely be highly visible from surrounding residential development, and may also impact on the special characteristics of the AONB.

[However,](#) it is highlighted within the [Malborough](#) Neighbourhood Plan Appendix that landscaping would be essential for the development, so as the site is not to be 'overpowering'. Policy 11 (Time Frame & Scale) requires that the build respects, reinforces, and where possible enhances the character and quality of Malborough. The policy further states that the development should offer ample open and green spaces commensurate with its setting on a south facing hillside within an AONB. In this context whilst development at the site has the potential to lead to adverse effects on landscape character, the policy approaches put forward for the site (as well as the other Neighbourhood Plan policies) will help minimise potential effects. [Development However, given the visibility of the site within the landscape, and the scale of the allocation \(which comprises major development\), significant impacts on landscape character within this sensitive AONB landscape remain likely.](#)

[Whilst impacts on the historic setting of Malborough village are likely as a result of the allocation, development is not expected to have significant adverse effects on specific features of interest for the historic environment, given no heritage assets are located in close proximity to the site.](#)

The reserve site allocation (Field Behind Church, Withymore Farm) and exception site Custom & Self Build (C&SB) Great Park (part of) are also visually prominent, with potential adverse effect on the landscape character and the special qualities of the AONB. Great Park (part of) is not expected to have adverse effects on the historic environment, with no heritage assets located in close proximity to the site. Development of the Field Behind Church, Withymore Farm, has the potential to result in adverse effects on both the Grade I listed Church of All Saints and the wider Conservation Area. However it is noted within the site assessment that the site slopes down away from the Conservation Area, and visual impacts could be mitigated by suitable screening¹. As discussed above, the application of the

¹ Malborough Neighbourhood Plan – Appendices (2017)

Neighbourhood Plan policies will help limit adverse impacts on landscape character from these potential new development areas, ~~and facilitate enhancements.~~ However, given the scale of development located in the AONB, residual adverse impacts on landscape character are likely to remain.

Updated Section 5.9: Conclusions at this current stage

5.9.1: Potential significant effects

The assessment has concluded that the current version of the Malborough Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'population and community', 'health and wellbeing' and 'transport' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on enhancing the quality of life of residents and accessibility, including through the delivery of housing to meet local needs, green infrastructure enhancements, and the implementation of high quality design and layout which supports the quality of the public realm and promotes road safety. In addition, the Neighbourhood Plan has a strong focus on maintaining and enhancing the rural nature of the parish, and protecting its environs and landscape character. ~~Further focus is also placed on the setting of the historic environment, ensuring that future change does not adversely affect the heritage value of the Neighbourhood Plan area. This is therefore expected to result in significant positive effects in relation to the 'landscape and historic environment' theme.~~

In relation to the 'landscape and historic environment' theme, the Neighbourhood Plan sets out a range of policy provisions for protecting landscape character and for conserving and enhancing the fabric and setting of the historic environment. However, even with these policy provisions, the proposed Neighbourhood Plan allocation and reserve allocations are likely to lead to inevitable significant effects on landscape character. This is given the scale of the allocations as major development, and the sensitivity of the landscape of the South Devon AONB.

The current version of the Malborough Neighbourhood Plan will initiate a number of beneficial approaches regarding the 'biodiversity', and 'climate change' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

Appendix A Updated Non-Technical Summary

Non-Technical Summary

What is strategic environmental assessment?

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

The Malborough Neighbourhood Plan presents a plan for the administrative area of Malborough Parish for the period to 2034. Prepared to be in conformity with the South Hams Local Development Framework, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, landscape and townscape character, the quality of life of residents, tourism and the protection and enhancement of the environment.

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

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Malborough Neighbourhood Plan, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2017), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the Malborough 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 Malborough 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 Malborough Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Malborough Neighbourhood Plan;
- The likely significant environmental effects of the Malborough Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Malborough Neighbourhood Plan; and
- The next steps for the Malborough Neighbourhood Plan and accompanying SEA process.

Assessment of alternative approaches for the Malborough Neighbourhood Plan

Assessment of housing numbers to take forward through the Malborough Neighbourhood Plan

The Malborough Neighbourhood Plan is being prepared in the context of the South Hams Local Development Framework and the Plymouth and South West Devon JLP, which was submitted to the Planning Inspectorate on 31 July 2017. With regards to the strategic distribution of housing within the District, Policy CS2 (Housing Provision) within the Core Strategy states that the villages in the District (those listed in Policy CS1 (Location of Development)) have the capacity to deliver 400 dwellings over the lifetime of the Plan. However, the Core Strategy does not specify a housing number for the Neighbourhood Plan area.

The submission version of the JLP ~~does~~ provided an indicative housing number for the Neighbourhood Plan area, stating that Malborough has the potential to accommodate around ten extra dwellings over the plan period, in order to limit the potential impact on the sensitive South Devon AONB landscape.² However, the JLP does not identify sites for development within Malborough, but takes an approach which aims to enable development to come forward in the village.

The Neighbourhood Plan Steering Group has been keen to explore the possibility of delivering an increased level of housing provision in the parish through the Malborough Neighbourhood Plan. This is with a view to supporting the vitality of the Neighbourhood Plan area, promoting growth which meets local housing needs and delivering community infrastructure.

To support decision-making on this element of the Malborough Neighbourhood Plan, the SEA process considered three broad options relating to the number of homes to be taken forward for the purposes of the Neighbourhood Plan. The three options are as follows:

- **Option 1:** Delivery of the minimum number of dwellings to meet the indicative housing requirement for the JLP (i.e. delivery of no further dwellings over and above the 10 minimum required)
- **Option 2:** Delivery of up to c.50 additional dwellings over the JLP indicative housing number through the Malborough Neighbourhood Plan
- **Option 3:** Delivery of over c.50 additional dwellings through the Malborough Neighbourhood Plan

These options were considered through the SEA Framework of objectives and assessment questions developed during scoping. The findings of the appraisal are presented in Section 4.3.1 of this Environmental Report.

In response to the appraisal of these options, the Neighbourhood Plan Steering Group came to the conclusion that the delivery of housing through the Malborough Neighbourhood Plan should reflect Option 2. It was viewed that delivering housing to this level would provide an appropriate balance between ensuring the protection of landscape character, local distinctiveness, the historic environment and biodiversity whilst also providing opportunities for delivering local housing need, community infrastructure and supporting the vitality and viability of the village.

Assessment of housing sites for allocation through the Malborough Neighbourhood Plan

Five sites were then considered by the Neighbourhood Plan Steering Group as potential locations for housing allocations to be taken forward for the purposes of the Neighbourhood Plan. 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 five sites and potential effects that may arise as a

² It should be noted that in August 2018, subsequent to examination on the Joint Local Plan, the ten dwelling figure for Malborough was removed as part of modifications made to the JLP.

result of housing development at these locations. The findings of the appraisal are presented in Section 4.3.2 of this Environmental Report.

Assessment of the current version of the Malborough Neighbourhood Plan

The submission version of the Malborough Neighbourhood Plan presents 42 planning policies for guiding development in the Malborough area, and a number of accompanying community projects.

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 Malborough Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following sustainability themes:

- Biodiversity and geodiversity;
- Climate change;
- Landscape and historic environment
- Population and community;
- Health and wellbeing; and
- Transportation.

The assessment has concluded that the current version of the Malborough Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'population and community', 'health and wellbeing' and 'transport' SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on enhancing the quality of life of residents and accessibility, including through the delivery of housing to meet local needs, green infrastructure enhancements, and the implementation of high quality design and layout which supports the quality of the public realm and promotes road safety. In addition, the Neighbourhood Plan has a strong focus on maintaining and enhancing the rural nature of the parish, and protecting its environs and landscape character. ~~Further focus is also placed on the setting of the historic environment, ensuring that future change does not adversely affect the heritage value of the Neighbourhood Plan area. This is therefore expected to result in significant positive effects in relation to the 'landscape and historic environment' theme.~~

~~In relation to the 'landscape and historic environment' theme, the Neighbourhood Plan sets out a range of policy provisions for protecting landscape character and for conserving and enhancing the fabric and setting of the historic environment. However, even with these policy provisions, the proposed Neighbourhood Plan allocation and reserve allocations are likely to lead to inevitable significant effects on landscape character. This is given the scale of the allocations as major development, and the sensitivity of the landscape of the South Devon AONB.~~

The current version of the Malborough Neighbourhood Plan will initiate a number of beneficial approaches regarding the 'biodiversity', and 'climate change' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

Next steps

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

~~If the subsequent Independent Examination is favourable, the Malborough Neighbourhood Plan will be subject to a referendum, organised by South Hams District Council. If more than 50% of those who vote agree with the plan, then it will be passed to South Hams District Council with a request it is adopted.~~

~~Once adopted, the Malborough Neighbourhood Plan will become part of the Development Plan for Malborough.~~

~~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 Local Plan.~~

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

