

Strategic Environmental Assessment for the Malborough Neighbourhood Plan

Environmental Report to accompany the Submission
version of the Neighbourhood Plan

July 2018

Quality information

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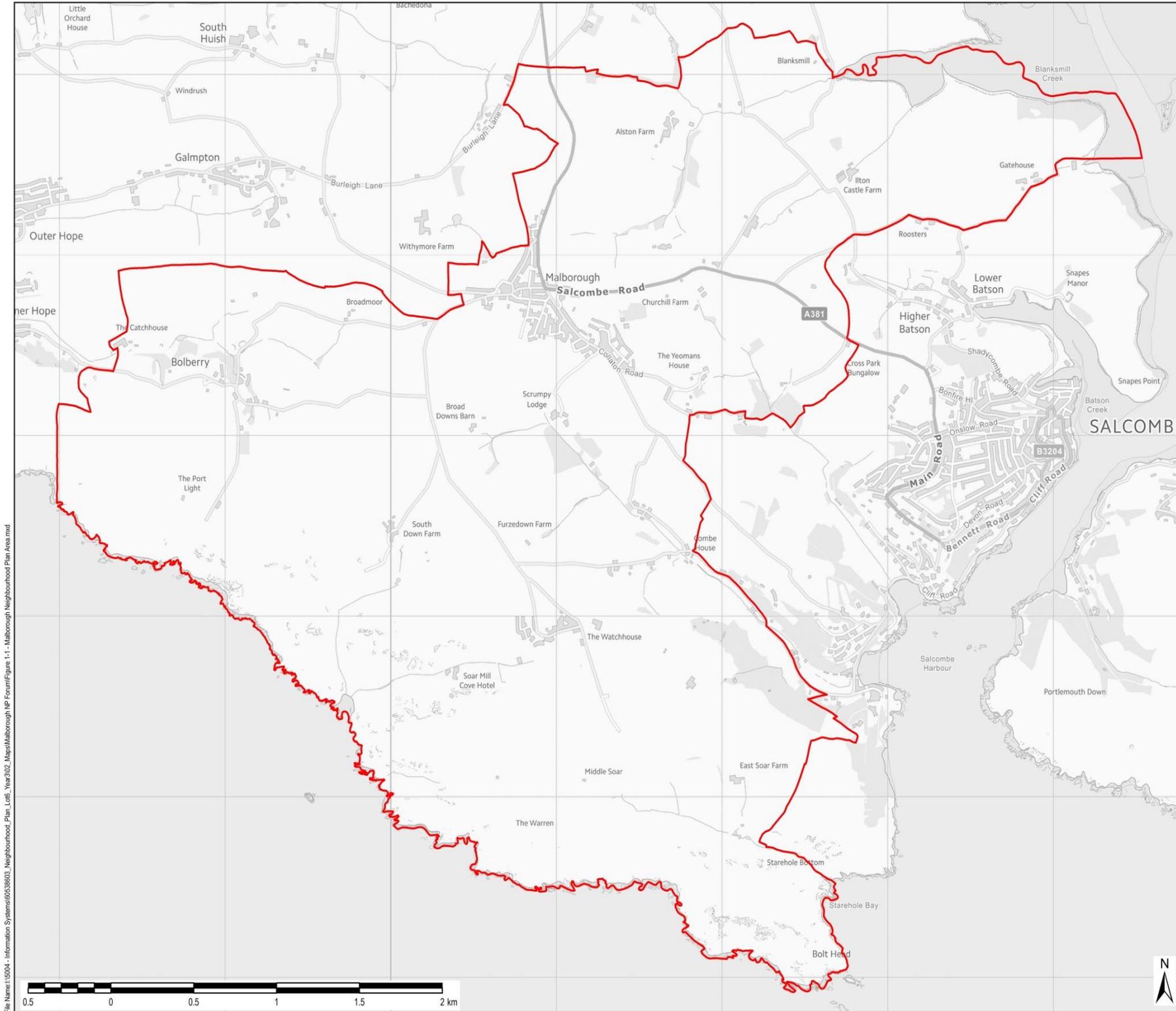
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LEGEND

Malborough Neighbourhood Plan Area

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Purpose of Issue **DRAFT**

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

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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 provide 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. 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 SFNP

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 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.

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.

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1. Introduction

1.1 Background

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

The Malborough Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which includes the administrative area of Malborough Parish (Figure 1.1), is being prepared in the context of the emerging South Hams Local Plan.

Key information relating to the Malborough Neighbourhood Plan is presented in Table 1.1.

Table 1.1: Key facts relating to the Malborough Neighbourhood Plan

Name of Qualifying Body	Malborough Parish Council
Title of Plan	Malborough Neighbourhood Plan
Subject	Neighbourhood Planning
Purpose	<p>The Malborough Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the South Hams Local Development Framework.</p> <p>The emerging Malborough Neighbourhood Plan will be used to guide and shape development within the Malborough Neighbourhood Plan area.</p>
Timescale	To 2034
Area covered by the plan	The Neighbourhood Plan area covers the parish of Malborough in south Devon (Figure 1.1).
Summary of content	The Malborough Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	<p>Debbie Ede, Malborough Neighbourhood Plan Steering Group</p> <p>Email via: malboroughparishcouncil@btinternet.com or http://www.malboroughvillage.org.uk/yourplancontact</p>

1.2 SEA explained

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

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

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹.

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

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

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

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

¹ Directive 2001/42/EC

1.3 Structure of this Environmental Report

This document is the Environmental Report for the Malborough Neighbourhood Plan and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ³
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the submission version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the submission version of the plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan
What happens next?	<ul style="list-style-type: none"> The next steps for plan making/SEA process.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

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

2.1 Local Plan context for the Malborough Neighbourhood Plan

The Malborough Neighbourhood Plan is being prepared in the context of South Ham's Local Development Framework, the key document of which is the Core Strategy Development Plan Document (2006-2026). It is also being prepared in the context of the emerging Plymouth and South West Devon Joint Local Plan (JLP), which will supersede the Local Development Framework and cover the time period up until the year 2034. The emerging JLP will set out the overarching strategy for the area, setting out where development will take place, what areas should be protected and how the area will change. It brings together previous work that has already been carried out by the three councils on South Hams 'Our Plan', West Devon's 'Our Plan' and the Plymouth Plan⁴. The JLP was submitted to the Secretary of State on 31st July 2017 and underwent Examination in Public in early 2018.

It is important to note that until the emerging JLP is adopted, the Local Development Framework will continue to provide the strategic level development plan for the parish. A key element of the Local Development Framework's Core Strategy is to design a long-term, locally distinctive vision for South Hams in order to deliver sustainable and appropriate development throughout the District. The vision is as follows:

- *Meeting communities needs locally*
- *Securing sustainable development*
- *Promoting the regeneration of market towns and villages and rural diversification*
- *Prioritising developments for affordable homes and new jobs*
- *Protecting and enhancing the area's precious environmental heritage*
- *Delivering the sustainable development of the Sherford new community*

Malborough is designated as a 'Village' in the Core Strategy. The Core Strategy states that development is acceptable in principle within the village settlements, (subject to detailed planning considerations such as: access to the site, the scale, bulk and design of the proposal and the effect on neighbouring properties.

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

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

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

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

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

Neighbourhood plans will form part of the development plan for the district, alongside, but not as a replacement for the Local Plan. The Joint Local Plan seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward. Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in South Hams District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

2.2 Vision for the Malborough Neighbourhood Plan

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

“

In 2034 Malborough will continue to be a vibrant, growing and prosperous community. It will have a balanced demographic of young people, working families and the elderly and retired. There is an aspiration that more than 90% of the housing stock will remain as permanent homes and these will be affordable, and accessible, to the local community (with reference to the average local wage). Local employment opportunities and services will be encouraged whilst the rural character of the village and its surroundings will be protected. Malborough will continue to provide and develop diverse leisure and recreational activities to ensure a happy, healthy, diverse community.

Vision for the Malborough Neighbourhood Plan

”

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

3. The Scope of the SEA

3.1 SEA Scoping Report

The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁵ These authorities were consulted on the scope of the Malborough Neighbourhood Plan SEA in July 2017.

The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:

⁵ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme*’.

- 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.

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
Natural England Corine Dyke, Lead Adviser, Sustainable Development Team, Devon, Cornwall and Isles of Scilly	
We welcome the Strategic Environmental Assessment (SEA) Scoping Report for the Malborough Neighbourhood Plan	Comment noted.
Considering our previous advice that the Plan needs to be accompanied by an SEA to assess likely significant effects of proposals on the South Devon Area of Outstanding Natural Beauty, it is surprising that the scoping report is very brief about landscape. There is no reference to the South Devon AONB Management Plan nor the adopted 'Planning for the South Devon AONB: Planning Guidance'. There is also no discussion of future trends for the landscape nor a summary of future baseline for landscapes. These issues need to be addressed to ensure that the SEA robustly assesses and underpins the Neighbourhood Plan	Potential impacts on the AONB have been considered, in conjunction with the provision of the AONB Management Plan and associated documents.
Whilst we note paragraphs 1.4 'The SEA explained' and 10.1 'Subsequent stages for the SEA process', the scoping report should also make clear that the Neighbourhood Plan's vision, every policy and each site specific proposal will be appraised separately, and that all these will also be assessed in combination.	Comment noted. Policies and combination of policies have been assessed through the SEA process.
Our previous advice on the pre-submission version of the Malborough Neighbourhood Plan stated: 'As the Plan area includes a site of European importance (South Devon Shore Dock SAC) it will need to be screened to determine whether a Habitats Regulations Assessment is required under the Habitats Directive. Please contact South Hams District Council on this matter'. We have to date not received an HRA screening opinion. We recommend that the conclusions of the HRA screening will be reflected in the Neighbourhood Plan's SEA.	The Malborough Neighbourhood Plan has been screened by South Hams regarding a Habitats Regulations Assessment (HRA). It has been concluded that a HRA is not required.

Consultation response	How the response was considered and addressed
Historic England David Stuart, Historic Places Adviser South West	
<p>It would be helpful to know the basis upon which South Hams District Council determined that an SEA would be required as this would inform those issues which might particularly be focussed on in formulating a response. In previous consultations on the Plan we drew attention to the possible potential which the Plan had for impact on designated heritage assets. While subsequent correspondence has largely addressed this issue there may be sufficient residual concern. I have attached details of correspondence for information.</p>	<p>The Malborough Neighbourhood Plan has been screened in by South Hams District Council as requiring an SEA due to the potential for significant environmental effects from site allocations within the Neighbourhood Plan area.</p>
<p>Within that [correspondence] you will see we refer to a Conservation Area, drawing upon the community's own reference to the existence of one. However, the SEA Scoping Report asserts that there is no conservation area so it is obviously useful to have definitive confirmation of this point for the purposes of the SEA exercise. This will not necessarily affect the SEA Objectives set out in 5.4 on p29 as these already cater for landscape and townscape character and features but obviously it will help in confirming the accuracy of the exercise overall.</p>	<p>A section on the Conservation Area has been included in the scoping information for the Landscape & Historic Environment topic (Section 5.3.1)</p>
<p>We refer you to our guidance on Setting, Site Allocations and Local Plans, and SEAs, which is available at: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/ https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<p>Comment noted.</p>
Environment Agency	
<p>No comments received.</p>	<p>N/A</p>

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

3.2 Key sustainability issues

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

3.2.1 Biodiversity

- The east of the Neighbourhood Plan area lies within the Salcombe to Kingsbridge Estuary SSSI Impact Risk Zone for residential development.
- Locally important wildlife sites feature within the Neighbourhood Plan area, including nine County Wildlife Sites.

- The integrity of the Biodiversity Action Plan Priority Habitats present both in and around the Neighbourhood Plan area should be preserved and protected in order to prevent the loss, fragmentation and deterioration of the distinctive ecological value of Malborough.

3.2.2 Climate Change

- An increase in the built footprint of the Malborough Neighbourhood Plan area (associated with the delivery of new housing and employment) has the potential to increase overall greenhouse gas emissions.
- The South Hams has had slightly higher per capita emissions than that of both the South West of England and England as a whole since 2005.
- However the South Hams has also seen a greater reduction in emissions when compared with the South West and England.
- The Malborough Neighbourhood Plan should seek to increase the Neighbourhood Plan area's resilience to the effects of climate change by supporting and encouraging adaptation strategies.

3.2.3 Landscape and Historic Environment

- The entire of the Neighbourhood Plan area is located within the South Devon Area of Outstanding Natural Beauty.
- The Malborough Conservation Area is located within Neighbourhood Plan area, designated for special architectural and historical interest.
- The Neighbourhood Plan area has a rich historic environment, with ten scheduled monuments, and 40 listed buildings nationally designated for their cultural heritage resource.
- Future management within the Neighbourhood Plan area should seek to protect the setting of heritage assets and landscape/townscape quality.
- New development could lead to pressures on non-designated sites and townscapes, including from the loss of key built and natural features.
- Improvement in access to and enhancement of, historic environment assets and enhancements to local distinctiveness through high quality development has potential for positive benefits for tourism.

3.2.4 Population and Community

- There is an ageing population within the Neighbourhood Plan area, with a higher proportion of residents within the 60+ age group than the average for South Hams, South West and England.
- The population increase from 2001 to 2011 within the Neighbourhood Plan is significantly higher than for South Hams, and is also higher than for the South West and England.
- The Neighbourhood Plan area performs excellently in terms of the outdoor quality of life, with sufficient access to fresh air and green spaces.
- The Neighbourhood Plan area is particularly deprived with regards to geographical barriers and indoor living categories. Furthermore, 58.9% of households within Malborough are deprived in some way, which is higher than the average for South Hams, and higher than the regional and national counterparts.

3.2.5 Health and Wellbeing

- The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health'. However, the percentage of residents reporting 'very good health' is below local, regional and national averages.

- Comparatively more residents report bad health or very bad health than district or South West averages.
- An ageing population has the potential to increase pressures on healthcare services, and is therefore a significant influence on future health and wellbeing in the Neighbourhood Plan area.

3.2.6 Transportation

- There is no railway station within the Neighbourhood Plan area, the nearest is approximately 21.5km north in Totnes.
- There are a number of Tally Ho! bus services running in the area, with connections to nearby towns.
- There is a need for continued enhancement to public transport as well as walking and cycling networks in the Neighbourhood Plan area.
- The village centre experiences congestion issues, particularly during peak summer periods.
- After driving, the second most popular method of travelling to work in Malborough is to work from home, with the value of 10.3% higher than the averages for South Hams the South West and the national average.

Given the lack of existing issues relating air quality, and land, soil and water resources, these topics were scoped out of the SEA process during scoping.

3.3 SEA Framework

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

Table 3.2: SEA Framework for the Malborough Neighbourhood Plan

SEA Objective	Assessment questions
Biodiversity and Geodiversity	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the status of the Bolt Head to Bolt Tail SSSI, located within the Neighbourhood Plan area boundary, and that of the Salcombe to Kingsbridge Estuary SSSI, directly adjacent to the south east boundary? • Support the integrity of the locally designated sites of interest? • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?

SEA Objective	Assessment questions
Climatic factors	
Promote climate change mitigation in the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Limit the increase in the carbon footprint of the parish from population growth? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Increase the number of new developments meeting sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that no development takes place in areas at higher risk of flooding, taking into account the likely effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the plan area? • Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?
Landscape and Historic Environment	
Protect, maintain and enhance the Neighbourhood Plan area's cultural heritage resource, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve the South Devon AONB and Heritage Coast? • Conserve and enhance buildings and structures of architectural or historic interest? • Support the integrity of the historic setting of key buildings of cultural heritage interest? • Conserve and enhance local diversity and distinctiveness? • Support access to, interpretation and understanding of the historic environment?
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the integrity of the local landscape character? • Support the integrity of the Malborough Conservation Area? • Conserve and enhance landscape and townscape features?
Population and Community	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities,

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

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

4.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

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

4.2 Overview of plan making / SEA work undertaken since 2014

Plan-making for the Malborough Neighbourhood Plan has been underway since 2014. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan.

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

The following sections discuss the evolution of the Malborough Neighbourhood Plan in association with the SEA process.

4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the Malborough Neighbourhood Plan. The SEA Regulations⁶ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for proposed development. Specifically, this chapter explains how the Malborough Neighbourhood Plan's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area.

4.3.1 Appraisal of alternative housing numbers to deliver through the Malborough Neighbourhood Plan

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

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

The submission version of the JLP does provide 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. 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 have 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 and current 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. Whilst it is recognised that the South Hams Local Development Framework remains the strategic development plan for Malborough, the emerging JLP provides an indicative housing number for Neighbourhood Plan area during the plan period. As such the options have considered alternative approaches in relation to this indicative number.

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 (see Section 3.3).

Table 4.1 presents the findings of the appraisal of Option 1 to Option 3 outlined above. These are presented through the six sustainability themes through which the SA Framework (Table 3.2) is presented. To support the appraisal findings, the three options have been ranked in terms of their sustainability performance against the relevant theme. It is anticipated that this will provide the reader with a likely indication of the comparative sustainability performance of the three options in relation to each theme.

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.</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

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
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.</p> <p>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.</p>	1	1	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

4.3.2 Assessment of alternative sites for taking forward through the Malborough Neighbourhood Plan

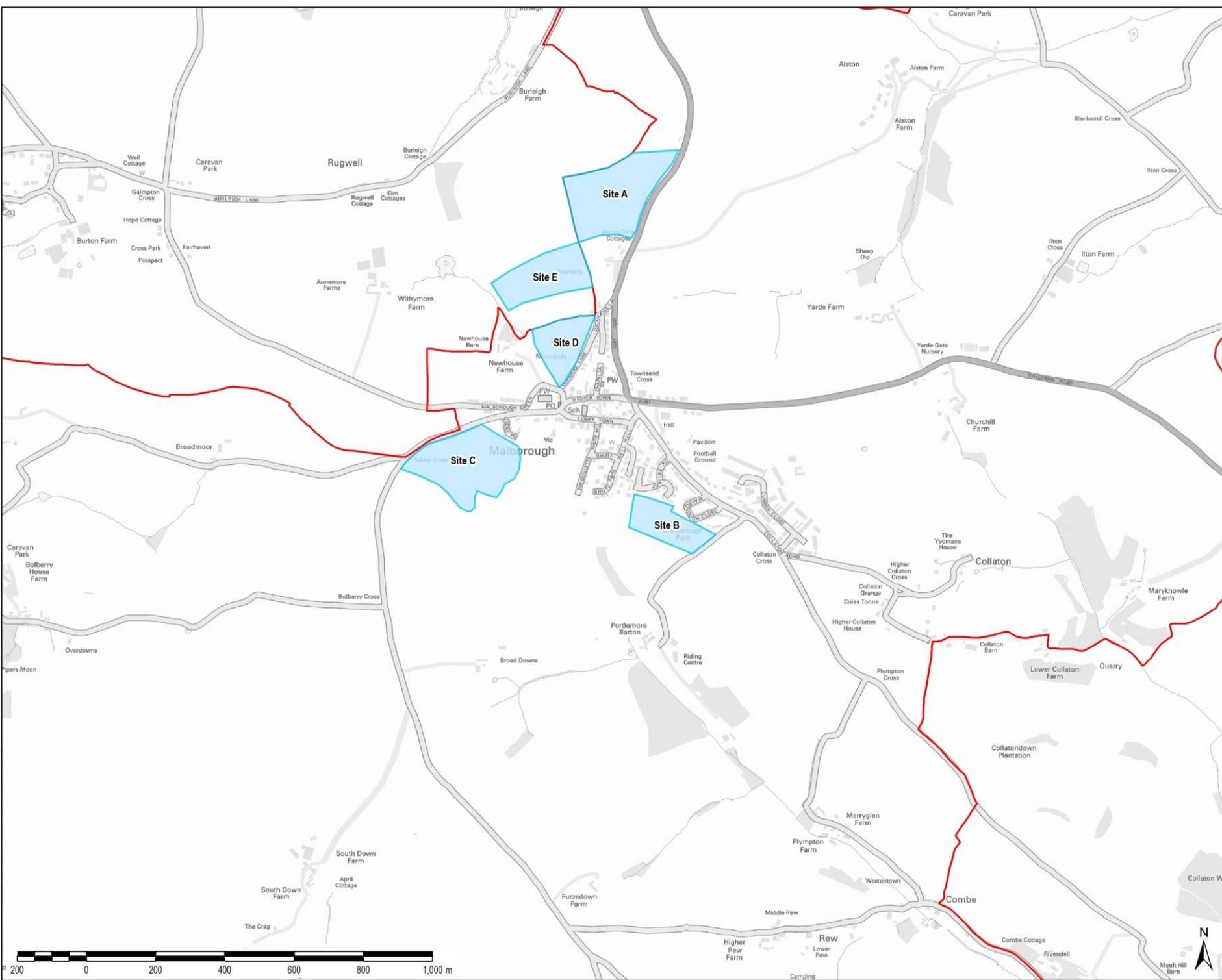
The Neighbourhood Plan Steering Group came to the conclusion that the delivery of housing through the Malborough Neighbourhood Plan should reflect Option 2. It was viewed that delivering housing to this level would provide an appropriate balance between ensuring the protection of landscape character, 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.

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. The locations of these sites are presented in Figure 4.1.

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 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 4.1) and the baseline information.

The tables below present a summary of this appraisal, and provide an indication of each site's sustainability performance in relation to the six SEA themes.

File Name: 15004 - Information Systems\60538603_Neighbourhood_Plan_L048_Year2022_Maps\Malborough NP Forum\Figures 4-1 - Sites Assessed for SEA.mxd



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LEGEND

- Malborough Neighbourhood Plan Area
- Site Option

Site A Wallfield
 Site B Portlemore Downs
 Site C Great Park, Withymore Downs
 Site D Field Behind Church, Withymore Farm
 Site E Easacombs (S. Huish)

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Purpose of Issue **DRAFT**

Client **MALBOROUGH NEIGHBOURHOOD PLAN FORUM**

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

Drawing Title **SITES ASSESSED FOR THE SEA**

Drawn CN	Checked JW	Approved RC	Date 14/11/2017
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Drawing Number **FIGURE 4.1** Rev **01**

Table 4.2: 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 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>	
Health and wellbeing	<p>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.</p>	
Transportation	<p>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.</p>	
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	<p>No significant biodiversity constraints are present on the site. The site is not within an SSSI Impact Risk Zone, nor Strategic Nature Area. West Portlemouth County Wildlife Site is located 250m to the southwest 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>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.</p>	
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, considering its south-facing hillside setting. Development at this location 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 due to its proximity to existing development and the field boundary acts 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 setting of the site.</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. 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 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>	
Key		
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 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>	
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 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>	
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).</p> <p>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

4.3.3 Choice of sites taken forward for the Neighbourhood Plan

The Malborough Neighbourhood Plan allocates one site for housing, at Portlemore Downs for a maximum of 49 dwellings. The site was chosen as an allocation by the Neighbourhood Plan Steering Group for a number of reasons. In addition to helping support the vitality of the village and the delivery of housing for local needs, the development of the site enables enhancements to pedestrian access to be made from the site to the playground, Malborough Park, Jubilee Park and the Portlemore Lane footpath. Through effective design this will facilitate enhanced and safe pedestrian access to and from key parts of the village, with traffic calming measures proposed along Collaton Road.

Development of the Portlemore Downs site will also deliver community facilities and amenities through Section 106 agreements/Community Infrastructure Levies due to the Parish. Provision includes a children's playground, a dog exercise area, and a Community orchard; the delivery of which will have a significant positive effect on the vitality of the Malborough Neighbourhood Plan area.

The Malborough Neighbourhood Plan also allocates one reserve site at Field Behind Church, Withymore Farm for local need. Additionally, the Plan allocates (part of) Great Park, Withymore Farm as an exception site for Self & Custom Build housing, providing land suitable for affordable housing that will be secured in perpetuity.

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

To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.2, the current version of the Malborough Neighbourhood Plan puts forward 42 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 (listed 1-42) are as follows:

Table 4.3: Malborough Neighbourhood Plan policies

HD1 Mix of Housing to Meet Local Needs	
1	Planning for Growth
2	Community Balance
3	Local Allocation Policy
4	Principle Residence Restriction
5	Change of Use/Level of Occupancy
6	Delivery
HD2 Building by Design	
7	High Quality Design
8	Retail and Commercial Frontages
HD3 Supporting Community Housing	
9	Supporting Community Housing
HD4 To identify sites to promote this development and provide detail on type, appearance, number and scheduling of development	
10	Allocation: The Portlemore Downs Site
11	Time Frame & Scale

12	Type
13	Access and Integration
14	Amenity Land and Community Facilities
15	Reserve Site Allocation – Field Behind Church, Withymore Farm
16	Custom & Self Build – Great Park (Part of)
G1	All New Development Should be Energy Efficient and Sustainable
17	Adapting to Climate Change: New Development and Consequential Improvements Policy (Residential)
18	Adapting to Climate Change: New Development and Consequential Improvements Policy (Non-Domestic)
19	Retrofitting historic/listed buildings
20	Dark Skies Policy
G2	All proposals for new housing will be required to demonstrate provision of appropriate new facilities on site and provision of, or contributions to, off-site facilities
21	South West Water
G3	Become a greener, more self-reliant & sustainable parish
22	Support for Small Scale Renewables & Low Carbon Energy Schemes
OE1	Secure and protect the rural nature of the parish, protecting its environs and landscapes in perpetuity
23	Siting of Development
24	Heritage
25	Trees, Woodland, Hedgerows and Devon Banks
26	Biodiversity
OE2	Identify land where development would be inappropriate and/or it may be necessary to limit freedom to change the uses of land and/or buildings
27	Local Green Space Designations
28	Protection of Green Spaces
29	Gardens
OE3	Continue to growth both choice and provision of diverse and recreational activities to promote health and well-being for all ages with particular emphasis on the young and the elderly
30	Community Benefit
OE4	Any new development should reinforce the character and quality of Malborough
31	Proposals would be expected to enhance the community enjoyment of the green space and contribute to an improvement to the character, accessibility, appearance and general quality or amenity value of the land [...]
E1	Protect and Support Existing Employment
32	Existing Employment Sites
33	Short-term Parking for Local Businesses

E2 Protect the existing economic uses of buildings used by the general public

34 Change of Use (agricultural)

35 Change of Use

E3 Encourage Low Impact New Employment Opportunities

36 Employment and Enterprise

37 Tourism

38 The Conversion of Touring Sites into Permanent Sites

39 Design of Employment Sites

CIT1 To ensure that New Development Enhances Access to, and Future Proofs, Local Services

40 Residential Streets & Access Roads

CIT2 To ensure that new housing has good pedestrian access into the village and good connections with existing facilities and housing stock

41 Sustainable Transport

42 Accessibility for All

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

5.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the Malborough Neighbourhood Plan. This chapter is structured as follows:

Sections 5.3 to 5.8 present an appraisal of the current version of the Malborough Neighbourhood Plan under the seven SEA theme headings; and

Section 5.9 subsequently discusses overall conclusions at this current stage.

5.2 Approach to the appraisal

The appraisal is structured under the six SEA themes.

For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.⁷ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

5.3 Biodiversity and geodiversity

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.

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 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.

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

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.

5.4 Climate change

In terms of climate change mitigation, road transport is proportionally a significant contributor to greenhouse gas emissions in the Malborough Neighbourhood Plan area. There is a heavy reliance on the car in the Parish, with high volumes of traffic passing through the village. The A381 road is the main route through Malborough village, and becomes highly congested during the summer months. The remainder of roads in the Neighbourhood Plan area comprise minor, often single lane country roads that cause additional traffic congestion, with high volumes of heavy vehicle through traffic making pedestrian passage difficult and unappealing. In this context, Policies 40- 42 seek to improve connections throughout the Neighbourhood Plan area through traffic calming, layout and access improvements, and temporary use of streets as social space. This will support and encourage the uptake of lower carbon modes of transport such as walking and cycling for shorter journeys and enhance access to bus routes on the A381.

The Malborough Neighbourhood Plan further supports climate change mitigation in the Neighbourhood Plan area through promoting energy efficiency and the provision of renewable energy. With regard to residential developments, the scope to set standards for residential building performance has been recently and radically curtailed by the Government's Housing Standards Review. The Ministerial Statement published on 25th March 2015 outlines the Government's new national planning policy on the setting of technical standards for new dwellings and Local Plan/Neighbourhood Plan making. Following the technical housing standards review, the government has withdrawn the code for sustainable homes (22nd April 2015) and so targets against this should no longer be set in policy. However, while recognising that the Code for Sustainable Homes no longer exists, the Malborough Neighbourhood Plan remains keen to deliver a 'greener future' and move towards carbon neutral development. Therefore the Neighbourhood Plan encourages developers to deliver high energy standards voluntarily, contributing positively to the achievement of sustainable development.

Policy 22 (Support for Small Scale Renewables & Low Carbon Energy Schemes) backs planning applications for energy generating infrastructure using renewable or low carbon energy sources to serve individual properties or groups of properties in settlements and countryside locations (where appropriate). Policies 17 (Adapting to Climate Change: New Development and Consequential Improvements Policy (Residential)) and 18 (Adapting to Climate Change: New Development and Consequential Improvements Policy: (Non-Domestic)) further supports high standards of sustainable development in individual proposals; in particular requiring that developers demonstrate how design,

construction and operation have sought to (for example) link the provision of low carbon energy infrastructure in new development to existing buildings, and reduce the use of fossil fuels. This is supported by Policy 19 (Retrofitting Historic/Listed Buildings), which encourages the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings. Policy 7 (High Quality Design) also seeks innovation to achieve low carbon sustainable design.

The protection and enhancement of open space and green spaces through Policies 27 (Local Green Space Designation) and 28 (Protection of Green Spaces) will promote climate change mitigation in the Neighbourhood Plan area through assisting carbon sequestration and promoting sustainable modes of transport. The policy will also encourage climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. Policy 25 (Trees, Woodland, Hedgerows and Devon Banks) supports biodiversity in the Neighbourhood Plan area, recognising that these key habitats are essential to the community as they absorb carbon dioxide and re-oxygenate the atmosphere, greatly enhance biodiversity, provide wind breaks and are a source of timber. The overall protection and enhancement of trees, woodland, hedgerows and Devon Banks within the Neighbourhood Plan area will therefore further help increase the resilience of ecological networks to the effects of climate change and support climate change mitigation.

In terms of climate change adaptation, the areas at highest risk of flooding in the Neighbourhood Plan area are those on the coast in the vicinity of the coastal areas, which are in a mixture of Flood Zone 2, showing that there is between a 0.1% (1 in 1,000) and 1% (1 in 100) chance of flooding, and Flood Zone 3, showing that there is a 1% (1 in 100) or greater chance of happening each year. There are no residential properties that lie within or in close proximity to this area, and therefore the majority of the high risk area remains undeveloped. There are also some areas within the Neighbourhood Plan area are at medium to high risk of surface water flooding; along watercourses and minor roads.

Whilst none of the sites allocated have significant flood risk issues, it is recognised that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.

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 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 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 is not expected to have an adverse effect on the historic environment, with no heritage assets 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 screening⁸. As discussed above, the application of the Neighbourhood Plan policies will help limit adverse impacts on landscape character from these potential new development areas, and facilitate enhancements.

5.6 Population and community

The recent Housing Needs Survey (HNS) (2015) undertaken for the Neighbourhood Plan evidences a current and local need for 23 affordable rented or shared ownership properties within Malborough. Seven homes have been deducted from this total of 23 as they are already planned for in Phase II of Alston Gate. A further 16 affordable homes are therefore needed. The Submission version of the Neighbourhood Plan allocates one site, Portlemore Downs, for development for a minimum of 16 Affordable Housing dwellings, meeting the identified need. Delivery of the site is subject to complying with all of the site specific conditions of Policies 8-12 within the Neighbourhood Plan.

Policy 11 (Time Frame & Scale) requires that 50% of the Portlemore Downs development should fulfil the affordable housing criteria. This is in line with Policies 2 (Community Balance) and 3 (Local Allocation Policy) which require development to contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities in the Neighbourhood Plan area. In this context, Policy 12 (Type) requires that the development of Portlemore Downs, which will provide a minimum of 16 affordable homes, should include 14 one to two bedroomed properties. This is in response to the HNS (2015), which demonstrated that the area of greatest need within the Parish is for one and two bedroom accommodation.

Policy 4 (Principal Residence Restriction) will further support improved accessibility to the housing stock for local residents, recognising that the existing housing stock has proven ideal for second home owners. The policy also seeks to restrict the use of new homes as second homes or holiday lets, improving availability and affordability of new housing in the Neighbourhood Plan area.

Policy 16 Custom & Self Build at Great Park (part of)) further promotes sustainable, inclusive communities, through providing opportunities for self-builders to build the type of home they require on an affordable basis. The exception site allocation for Great Park (part of) requires the set-up of a Community Land Trust (CLT) to take ownership of the land. This allocation requires that *"the objective of any emerging CLT will be to develop 100% affordable housing to enable young, and local families to live and work in our village and make [the] community more sustainable."* This would contribute towards creating high quality, distinctive and diverse residential neighbourhoods, as supported by Policy 2 (Community Balance). Policy 23 (Siting of Development) seeks to ensure the 'village feel' and sense of community maintained and enhanced. The policy requires that proposals *"have a scale and form which would be complementary to surrounding properties and/or landscape and would not result in the loss of amenity for existing residents."* Drawing on strong engagement with the community therefore, the Malborough Neighbourhood Plan supports housing delivery to meet local need.

In terms of the quality of housing, the Neighbourhood Plan (primarily through Policy 7 (High Quality Design but also through Policies 1-16) places focus on the high quality design, layout, scheduling and type of new housing. This will support the quality of life of residents in the Neighbourhood Plan area.

In terms of accessibility to services and facilities, the allocated site Portlemore Downs is well suited in terms of access to the main village including day-to-day services and facilities. The site also is in close proximity to the bus stop on Cumber Close, which is serviced by the 606 which runs to Salcombe and Kingsbridge. A key element of the development of the Portlemore Downs site is pedestrian access. Policy 12 (Access & Integration) requires that *"good pedestrian access is provided and available to the playground, Malborough Park, Jubilee Park and the Portlemore Lane footpath. Access to other parts of the village should also be freely available and not restricted."* This will facilitate enhanced and safe

⁸ Malborough Neighbourhood Plan – Appendices (2017)

pedestrian access to and from key parts of the village, creating new and enhanced links in the village's pedestrian network, and reducing worries about personal/child safety.

Improved accessibility will also be supported through the policies which facilitate improved transport connectivity and traffic management. These include policies 40-43, 13 (Access and Integration) and 7 (High Quality Design). This will also support the visitor economy. The importance of the visitor economy is recognised throughout the Malborough Neighbourhood Plan; Policy 37 (Tourism) supports proposals which will maximise the visitor offer of the area and increase tourism revenue. Touring caravan and camping sites will be encouraged, except for when touring sites are being converted into more permanent sites; maintaining the existing layout of the community and avoiding "development creep". Policy 39 (Design of Employment Sites) further supports tourism while avoiding adverse effects on the environment. The policy requests that rural diversification maintains and enhances the distinctive character and special qualities of the AONB.

Protecting landscape character and the historic environment, and enhancing the natural environment, further benefits the local tourism economy through ensuring the Neighbourhood Plan area preserves its characteristic scenic value. This will support the vitality of the area.

The growth of the local economy is primarily supported through Policy 36 (Employment and Enterprise). The policy responds to the shortage of employment premises in the Neighbourhood Plan area through a flexible approach, supporting employment opportunities at new and existing sites, and accommodating for rural diversification and construction. This will help diversify the economy and encourage more start-up businesses to locate in the Neighbourhood Plan area, moving away from being a commuter dormitory settlement. The viability of existing employment sites will be supported through Policies 32-35 which seek to protect and support existing employment sites, and the existing economic uses of buildings. Provision of well-located cycle and short term parking spaces through Policy 33 (Short Term Parking for Local Businesses) will contribute towards economic development through facilitating suitable access to employment. This will further facilitate economic activity in the Neighbourhood Plan area, contributing towards becoming a thriving self-reliant, living and working community.

5.7 Health and wellbeing

The policies of the Malborough Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents. The main impacts of the Neighbourhood Plan's policies on health and wellbeing will be through protecting and enhancing the Neighbourhood Plan area's high quality environment and public realm (as discussed under Section 5.5). This provides space – including natural green space – for recreation and relaxation, as well as air and water quality benefits. Access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation⁹. In this context the quality of life of residents will be further promoted by Policies 27 (Local Green Space Designation) and 28 (Protection of Green Spaces). This identifies six locations in the Neighbourhood Plan area to be designated as Local Green Spaces, where development will not normally be permitted.

New public open space will be further promoted through Policy 7 (High Quality Design) and Policy 14 (Amenity Land and Community Facilities). In relation to the site allocation Portlemore Downs, Policy 14 details generic site conditions which will positively affect the health and wellbeing of residents, including the provision of a children's playground, provision for a safe and secure dog exercise area, a community orchard, and a wildlife corridor/strip. Benefits to residents will include improved physical and mental health, and enhanced social interaction between residents.

Policy 30 (Community Benefit) seeks to ensure that any provision of, and/or improvement to, community facilities in the village will be directed by the Parish, to ensure delivery meets demand. Section 106 agreements/ Community Infrastructure Levies will be set against named projects, supporting community cohesion and improving residents' quality of life.

⁹ Public Health England (2017)

Residents' quality of life will also be supported through policies which directly and indirectly promote sustainable travel, and seek to reduce traffic congestion through the village. In this context, Policies 40-42 support proposals that protect and mitigate against the impact of traffic within residential and community areas, promoting development that has good pedestrian access into the village and good connections with existing facilities. This is an important element for the Neighbourhood Plan area as large amounts of car traffic in the summer months can make walking and cycling difficult, and in some instances, unsafe. Improving the attractiveness of public/sustainable transport methods in the village would have a positive effect on residents' neighbourhood satisfaction, while also promoting physical and psychological well-being.

5.8 Transport

Transportation is currently a key issue within the Malborough Neighbourhood Plan area, and there is a need for continued enhancements to public transport as well as walking and cycling networks in the Neighbourhood Plan area. The lack of adequate public transport in the area has resulted in high car dependency. The village centre experiences congestion issues, particularly during peak summer periods, and road safety is a key concern for the Parish.

Policy 40 (Residential Streets & Access Roads) supports proposals that protect and mitigate against the impact of traffic within residential and community areas. The policy requires effective design to ensure development is *"genuinely pedestrian friendly, where worries about personal safety or that of small children are alleviated"*. Accessibility is further supported through Policy 42 (Accessibility for all) which encourages proposals to improve access for all sectors of the society, including the elderly and disabled. This will enhance pedestrian safety and possibly encourage sustainable methods of travel.

Policy 39 (Design of Employment Sites) considers the potential effects of employment development on the local transport network. The policy requires that "development has no unduly adverse effect on residential amenity through traffic". Policy 33 (Short-term Parking for Local Businesses) also seeks to alleviate traffic in the village, providing well-located cycle and parking spaces for commuters. However, provision is short-term and therefore does not provide a long-term solution to peak-time congestion and parking issues in the village.

Whilst direct enhancements to public transport provision is outside of the scope of the Neighbourhood Plan, Policy 41 (Sustainable Transport) states that development should include proposals which enhance the attractiveness of walking, cycling and public transport within Malborough village. In this context, the enhancements of sustainable transport routes will further encourage healthier modes of travel, and help limit car use for shorter journeys within the Neighbourhood Plan areas. Policy 23 (Siting of Development) further encourages the uptake of sustainable transport, through requiring proposals to develop sites that are connected to the existing settlement, with appropriate access provision. Residents are likely to be able to walk or cycle to the village's amenities and facilities, again further reducing the reliance on the car.

The Portlemore Downs site allocation (Policy 10) is located on the edge of the village, with sufficient access to the village centre, amenities and local bus routes. It is also located adjacent to the public rights of way network, which runs along the southern boundary of the land parcel. Policy 13 (Access & Integration) ensures that the allocation will also be supported by upgraded and enhanced pedestrian access to recreational facilities, widened vehicular access along Portlemore Lane, and improved street design to reduce safety risks. This will help improve access throughout the village, reduce safety concerns, and alleviate any adverse effects that may have resulted from increased vehicles on Portlemore Lane.

Field Behind Church (Withymore Farm) reserve site is also well located to access the existing services and facilities of the village; however in terms of accessibility, access from Luckhams lane is severely constrained at both ends. As such, development could result in adverse effects on the road network with possible increased congestion at this location. The site is however within walking distance of a bus stop and well connected to the PRoW network.

The Great Park (part of) exception site is less well connected to the existing centre, being located on the outskirts of the settlement to the west. The site has sufficient access to bus services, however it is not linked to the PRow network. Taking this into consideration there is likely to be some reliance on the car as primary mode of travel for residents. However, it is noted that in line with Policy 41 (Sustainable Transport), development will be expected to encourage the uptake of sustainable modes of travel.

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.

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.

6. What are the next steps?

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

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

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

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

Appendix A Context review and baseline

A.1 Biodiversity

Context Review

At the European level, the EU Biodiversity Strategy¹⁰ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

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

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

The Natural Environment White Paper (NEWP)¹¹ sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

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

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to '*halt*

¹⁰ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf> last accessed [30/01/17]

¹¹ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [02/05/17]

*overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people*¹².

At the local level, Core Strategy Policy CS10: Nature Conservation directly relates to the biodiversity and geodiversity theme. Additionally, the Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV28 – Protecting and enhancing biodiversity and geological conservation, within the Joint Local Plan states '*Development should support the conservation, enhancement and restoration of biodiversity and geodiversity across the Plan Area.*' Furthermore, DEV27 – Nationally protected landscapes, SPT11 – Strategic Approach to the Environment, and DEV 30 – Trees, woodlands and hedgerows, are all related to biodiversity or geodiversity.

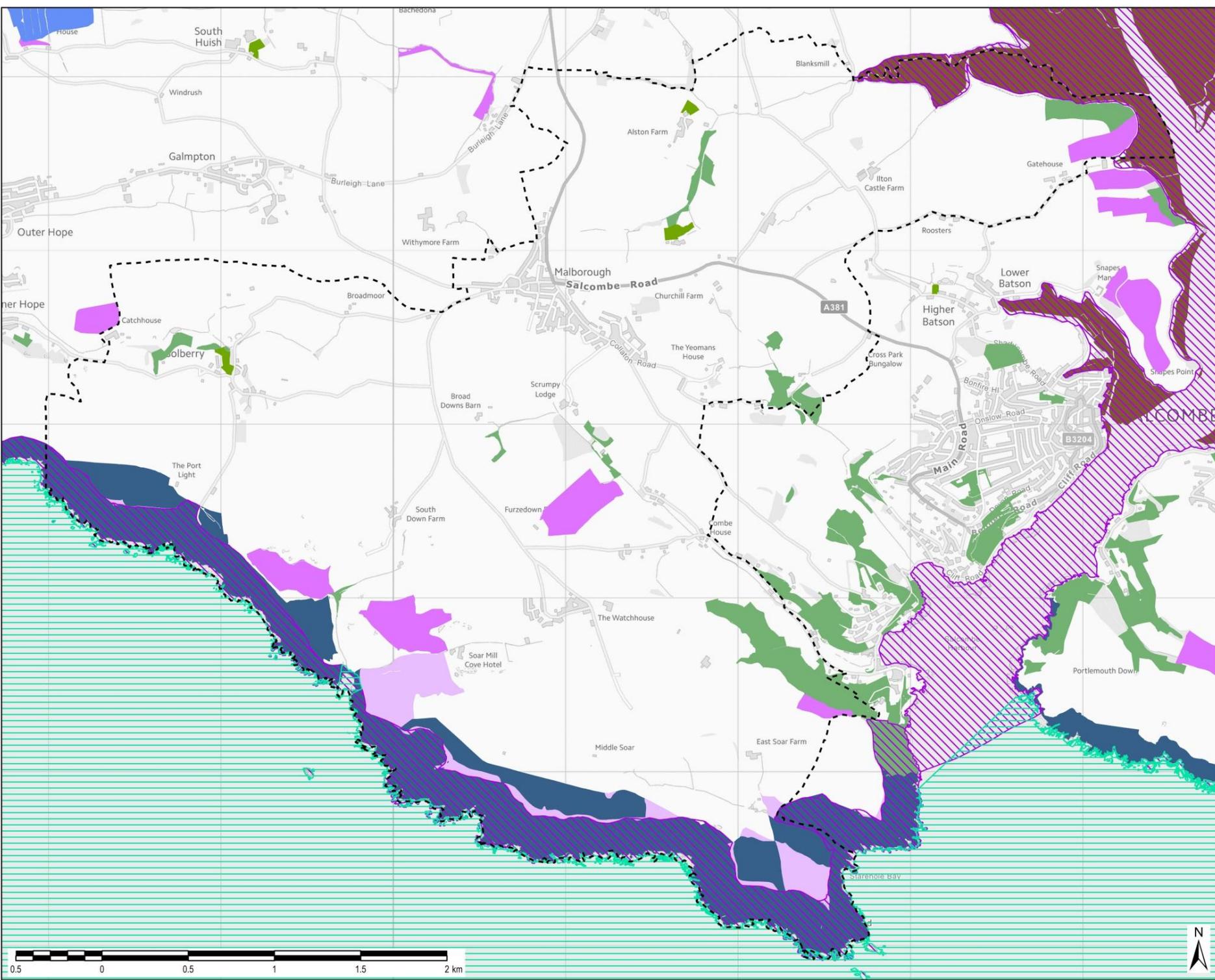
In 1998 The Nature of Devon-Biodiversity Action Plan was published, identifying 29 key wildlife habitats and 251 key species as a priority for conservation action. Action Plans were produced for the 17 habitats and 20 species identified as requiring a county wide approach to their conservation. Devon's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

The Devon Biodiversity and Geodiversity Action Plan¹³ is presented in 8 volumes:

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

¹² DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [02/05/17]

¹³ Devon Council (2009) Biodiversity and Geodiversity Action Plan [online] available at <<https://new.devon.gov.uk/environment/wildlife>> last accessed [06/06/17]



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LEGEND

- Malborough Neighbourhood Plan Area
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)

Biodiversity Action Plan Priority Habitats

- Coastal and Floodplain Grazing Marsh
- Coastal Saltmarsh
- Deciduous Woodland
- Good Quality Semi-improved Grassland
- Lowland Heathland
- Maritime Cliff and Slope
- Mudflats
- Traditional Orchard

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Baseline Summary

Current baseline

The Neighbourhood Plan area includes the Bolt Head to Bolt Tail Site of Special Scientific Interest (SSSI) along its southern boundary. This nationally designated site contains habitats and species listed in the annexes of both the European Habitats Directive (92/43/EEC) and the European Birds Directive (79/409/EEC). Additionally, the Neighbourhood Plan area contains locally designated sites and a variety of BAP Priority Habitats and Species, discussed below.

South Devon Shore Dock Special Area of Conservation (SAC)

SACs are protected sites that are designated under the EC Habitats Directive (92/43/EEC) and by the UK government¹⁴. Part of the 332.12ha South Devon Shore Dock SAC is located adjacent to the south east boundary of the Neighbourhood Plan area at its closest point near Soar Mill Cove. The character of this area comprises 30% marine areas (sea inlets) and 70% shingles (sea cliffs).

Bolt Head to Bolt Tail SSSI

The 195.7ha Bolt Head to Bolt Tail SSSI is located along the southern boundary of the Neighbourhood Plan area, and was notified in 1986 under Section 28 of the Wildlife and Countryside Act 1981. The SSSI is nationally important for its high botanical value due to the presence of a range of rare and local flowering plants and lichens, as well as its invertebrate fauna for breeding birds. Bolt Head to Bolt Tail SSSI also lies within the South Devon Area of Outstanding Natural Beauty. The citation for the SSSI states¹⁵:

This site is of high botanical value due to the presence of many rare or local flowering plants and lichens and is also important for its invertebrate fauna and for breeding birds.

The bedrock consists of mineral-rich Lower Devonian schists forming cliffs rising to some 120 m for about 9 km, facing mostly south west. On the cliffs there is a thin layer of well drained loamy brown-earth soil supporting maritime rock-crevice, maritime grassland, maritime heath and scrub communities. Broadleaved woodland occurs at the sheltered north-east end.

*The maritime grassland communities are characterised by Red Fescue *Festuca rubra* with Thrift *Armeria maritima*, Yorkshire Fog *Holcus lanatus*, Sea and Buckshorn Plantain *Plantago maritima* and *P. coronopus*, Wild Carrot *Daucus carota* and Bluebell *Hyacinthoides non-scripta*. Bloody Cranesbill *Geranium sanguineum* also occurs.*

*The grassland often fades out on to bare rock, or merges with heathland of Heather *Calluna vulgaris*, Bell Heather *Eric cinerea* and Western Gorse *Ulex gallii*. These plant communities contain a number of nationally rare or uncommon species such as Carrot Broomrape *Orobanche maritima*, Upright Chickweed *Moenchia erecta*, Autumn Squill *Scilla autumnalis*, Portland Spurge *Euphorbia portlandica* and Sea Storksbill *Erodium maritimum*.*

*The rocks support a wide variety of lichens, including an assemblage with Mediterranean affinities. Rare species include *Cladonia convoluta* and *C. forma*. *Teloschistes flavicans*, *Roccella fuciformis*, *R. phycopsis* and *Buellia leptoclinoides*.*

*There are many areas of bracken *Pteridium aquilinum* and of scrub species such as Gorse *Ulex europaeus*, Blackthorn *Prunus spinosa*, Hawthorn *Crataegus monogyna* and Bramble *Rubus fruticosus*. North of Bolt Head, facing the Salcombe Estuary, there is a stretch of woodland dominated by Sessile Oak *Quercus petraea*, with some Ash *Fraxinus excelsior*, Beech *Fagus sylvatica* and Sycamore *Acer pseudoplatanus*.*

¹⁴ Joint Nature Conservation Committee (no date): Special Areas of Conservation (SAC) [online] available at: <http://jncc.defra.gov.uk/page-23> last accessed [09/06/17]

¹⁵ Natural England (no date): Bolt Head to Bolt Tail SSSI [online] available at: <https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1002127.pdf> last accessed [05/06/17]

*The invertebrate fauna contains many species limited mainly to southerly coastal sites. Three nationally rare species of ant are found namely *Solenopsis fugax*, *Strongylognathus testaceus* and *Anergates atratulus* (the latter two species being parasites in the nests of *Tetramorium caespitum*). The Grey Bush Cricket *Platycleis denticulata* is plentiful and there are two native species of cockroach *Ectobius pallidus* and *Ectobius panzeri*.*

*The scrub provides nesting cover for Cirl Bunting *Emberiza cirlus* and other birds, while Fulmar *Fulmarus glacialis* and Shag *Phalacrocorax aristotelis* breed on the cliffs and rocks.'*

The most recent condition assessment of this SSSI was undertaken in 2017 and 90% of the area is classified as 'favourable', with the remaining 10% of the SSSI is classified as 'unfavourable-recovering'.

Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs.

The Neighbourhood Plan area falls within an IRZ for the Bolt Head to Bolt Tail SSSI, however this does not include residential development.

Salcombe to Kingsbridge Estuary SSSI

The 651.5ha Salcombe to Kingsbridge Estuary SSSI is located adjacent to the south east boundary of the Neighbourhood Plan area at its closest point, and was notified in 1987 under Section 28 of the Wildlife and Countryside Act 1981. The SSSI is nationally important for its diverse intertidal and sub-tidal flora and invertebrate fauna, with some outstanding examples of these species in the north east Atlantic. The citation for the SSSI states¹⁶:

'The Salcombe-Kingsbridge Estuary possesses a very rich and diverse intertidal and subtidal flora and invertebrate fauna, with certain communities being outstanding examples of their type in the North-east Atlantic.

Originally an unglaciated river valley, the Estuary has been partly drowned following the post-glacial rise in sea level, and is now a sheltered marine inlet or 'ria'. The lower estuary is partially separated from the open sea by a submerged sandbar and is characterised by rocks and sandy bays, while the upper estuary comprises mainly intertidal mudflats. The streams flowing into the creek heads are small and over the majority of the estuary marine conditions prevail so that many truly marine plants and animals are found which seldom occur intertidally in estuaries elsewhere.

*The majority of the upper estuary intertidal area comprises soft sediments, colonized in parts by green algae *Enteromorpha* and *Ulva* spp. and bordered by brown algae *Fucus* spp. The sediments, although generally exposed to underwater currents, are sheltered from wave action so that some, particularly around the Salt Stone, support exceptionally rich invertebrate faunas. These include large populations of tube-living and burrowing worms, burrowing bivalves, and beds of the Daisy Anemone *Cereus pedunculatus*. On muds and gravels extensive growths of sponges such as *Hymeniacidon perleve* and *Halichondria bowerbanki* have developed, in turn colonized by a wide range of species including the sea squirt *Phallusia mamillata*. At and below the low water mark populations of the Proboscis Worm *Golfingia elongata* and the burrowing crustaceans *Upogebia deltaura* and *Callinassa* spp. occur in silty sand, and the Angular Crab *Goneplax angulata* in sandy mud, while small stones are frequently colonized by sea squirts.*

*The sand and mud of the lower shore along both sides of Salcombe Harbour, particularly at Hill Bay and Ditch End Cove, support communities extremely rich in burrowing fauna and there is a long history of study here. At and below low water mark the sand is colonized extensively in places by Eel-grass *Zostera marina* and by the Sea Potato *Echinocardium cordatum* with its commensal bivalve *Montacuta ferruginosa*.*

¹⁶ Natural England (no date): Bolt Head to Bolt Tail SSSI [online] available at: <https://necmsi.esdm.co.uk/PDFsForWeb/Citation/1002127.pdf> last accessed [05/06/17]

The rocky shores of the estuary support communities typical of sheltered mouth-of-the estuary conditions, but are particularly rich in marine algae. The Salt Stone is one of the few British localities for the red alga Chondria coerulescens, and Castle Rocks possess an exceptional flora which include the kelp Laminaria ochroleuca and, among red algae, Gracilaria foliifera and all four British species of Gigartina. The overhangs and gullies of the Castle Rocks support a rich fauna including the cowry Trivia arctica, the Sea Gerkhin Cucumaria saxicola and many sponges and crustacea.

The bed of the main channel from the entrance to Salcombe Harbour to the Salt Stone is of mixed sediments with stones and shells. The communities present are very rich in algae and animals, including several rare or unusual species. At Snapes Point and Scoble Point broken rock surfaces extend into deep water and are colonized by typical ria communities.

At the heads of the tributary creeks small areas of saltmarsh occur. This saltmarsh is in an early stage of development, with the flora dominated by Sea Aster Aster tripolium, Common Saltmarsh-grass Puccinellia maritima and Sea Plantain Plantago maritima.

The estuary is used as an overwintering ground by large numbers of wildfowl such as Wigeon Anas penelope, Teal A. cracca and Shelduck Tadorna tadorna and the intertidal mudflats are important feeding grounds for passage waders. West Charleton Marsh, separated from the estuary by a sea wall, is used for roosting and feeding by a variety of waders and wildfowl at high tide.'

The most recent condition assessment was undertaken in 2013. Of the seven units assessed, six are classified at 'favourable', with the final unit classified as 'unfavourable – recovering'.

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.

Locally designated Sites

In Devon, sites of local interest are designated as County Wildlife Sites (CWS). County Wildlife Sites make up approximately 4% of Devon, and are designated due to the presence of particular habitats and species, such as traditionally managed species-rich lowland meadows, upland oak woodlands, lowland fens and mires. Some sites are designated due to the presence of particular species such as cirl bunting, bastard balm and great crested newt. CWS are designated through a strict criteria and data regarding the sites is collected by the Biodiversity Monitoring Framework¹⁷.

There are nine County Wildlife Sites within the Malborough Neighbourhood Plan area, these are;

- Hope Barton County Wildlife Site;
- Bolberry Down County Wildlife Site;
- Soar Valley County Wildlife Site;
- Cathole Point County Wildlife Site;
- The Warren, Malborough County Wildlife Site;
- Starehole Bottom County Wildlife Site;
- East Soar Farm County Wildlife Site;
- Tor Woods County Wildlife Site; and
- West Portlemouth County Wildlife Site.

Biodiversity Action Plan Habitats

¹⁷ Devon Biodiversity Records Centre (no date) County Wildlife Sites [online] available at: <<http://www.dbrc.org.uk/county-wildlife-site-survey/>> last accessed [06/06/17]

The Biodiversity Action Plan (BAP) Habitats¹⁸ located within the Neighbourhood Plan include:

- Maritime Cliffs and Slopes – found along areas of coastline from Fernyhole Point to Bolt Head;
- Good Quality Semi – Improved Grassland (non-priority) – found in three patches across the central and southern areas of the Neighbourhood Plan Area;
- Lowland Heathland – found in the West Soar area and continues eastwards along the South West Coastal Path towards Starehole Bay;
- Ancient and semi-natural woodland – found in Tor Woods;
- Deciduous woodland – a number of discrete patches across the Neighbourhood Plan area, with the largest area located in the south west (Tor Woods);
- Broadleaved woodland – a couple of small areas across the Neighbourhood Plan area which are connected to deciduous woodland;
- Mixed woodland – a couple of small areas towards the centre of the Neighbourhood Plan area;
- Woodland (young trees) – a number of small areas towards the centre of the Neighbourhood Plan area around Malborough; and
- Traditional Orchards – found in three distinct areas in the north and west of the Neighbourhood Plan area: Yarde Farm, the grounds of Alston Manor House and near Karrageen Farm (Bolberry).

Geodiversity

The geology of the Neighbourhood Plan area comprises primarily of Lower Devon Schists. These geological formations are characterised by thick parallel bands of minerals and are only found in the southernmost parts of Devon in the area around Salcombe and a couple of isolated areas along the coast between Start Point and Bolt Tail.

Figure 3.1 (overleaf) shows the location of designated sites and BAP Priority Habitats located within the Neighbourhood Plan area.

Future Baseline

Habitats and species will possibly face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Benefits for biodiversity have the potential to arise from the increasing integration of biodiversity considerations within decision making, including through The Plymouth and South West Devon Joint Local Plan 2014-2034, the AONB Management Plan, as well as local initiatives to enhance biodiversity.

A.2 Climate Change

Context Review

In its 2007 strategy on climate change, the European Commission assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.¹⁹ In relation to energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment

¹⁸ MAGIC (2017): 'Interactive Mapping Tool' [online] available at: <<http://www.magic.gov.uk/MagicMap.aspx>> last accessed [06/06/17]

¹⁹ Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond [online] available at: <<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF>> last accessed [07/06/17]

of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report to achieve the following:

- *'Based on the latest understanding of current, and future, climate risks and opportunities, vulnerability and adaptation, what should the priorities be for the next UK National Adaptation Programme?'²⁰*

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

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

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

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gases (GhG), including in terms of meeting the targets set out in the Climate Change Act 2008²¹. Specifically, planning policy should support the move to a low carbon future through:
 - Planning for new development in locations and ways which reduce GhG emissions;
 - Actively supporting energy efficiency improvements to existing buildings;
 - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
 - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
 - Encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Flood and Water Management Act²² 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);

²⁰ GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> last accessed [07/06/17]

²¹ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO₂ emissions of at least 26% by 2020, against a 1990 baseline.

²² Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

- 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)²³

Further guidance is provided in the document 'Planning for SuDS'.²⁴ 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'.

At the local level, Core Strategy Policy CS11: Climate Change directly relates to the Climate Change theme. Furthermore, the Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV35 – Delivering low carbon development, states: *'The need to deliver a low carbon future for Plymouth and South West Devon should be considered in the design and implementation of all developments, in support of the UK's legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels (Climate Change Act 2008).'*

Baseline Summary

Current baseline

Potential effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team²⁵. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the south west by 2050 for a medium emissions scenario²⁶ are likely to be as follows:

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

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

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;

²³ N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

²⁴ CIRIA (2010) 'Planning for SuDs – making it happen' [online] available to access via http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx last accessed [07/06/17]

²⁵ The data was released on 18th June 2009: See: <http://ukclimateprojections.metoffice.gov.uk/> last accessed [07/06/17]

²⁶ UK Climate Projections (2009) South West 2050s Medium Emissions Scenario [online] available at: <http://ukclimateprojections.metoffice.gov.uk/23687?emission=medium> last accessed [07/06/17]

- 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.

Flood Risk

The areas at highest risk of flooding in the Neighbourhood Plan area are those on the coast in the vicinity of the coastal areas, which are in a mixture of Flood Zone 2, showing that there is between a 0.1% (1 in 1,000) and 1% (1 in 100) chance of flooding, and Flood Zone 3, showing that there is a 1% (1 in 100) or greater chance of happening each year. There are no residential properties that lie within or in close proximity to this area, and therefore the majority of the high risk area remains undeveloped. The remainder of the Neighbourhood Plan area is situated in Flood Zone 1 (low probability of flooding), showing that there is a less than 0.1% (1 in 1,000) chance of flooding each year.

Figure A1 displays the flood risk areas present in the Neighbourhood Plan area.

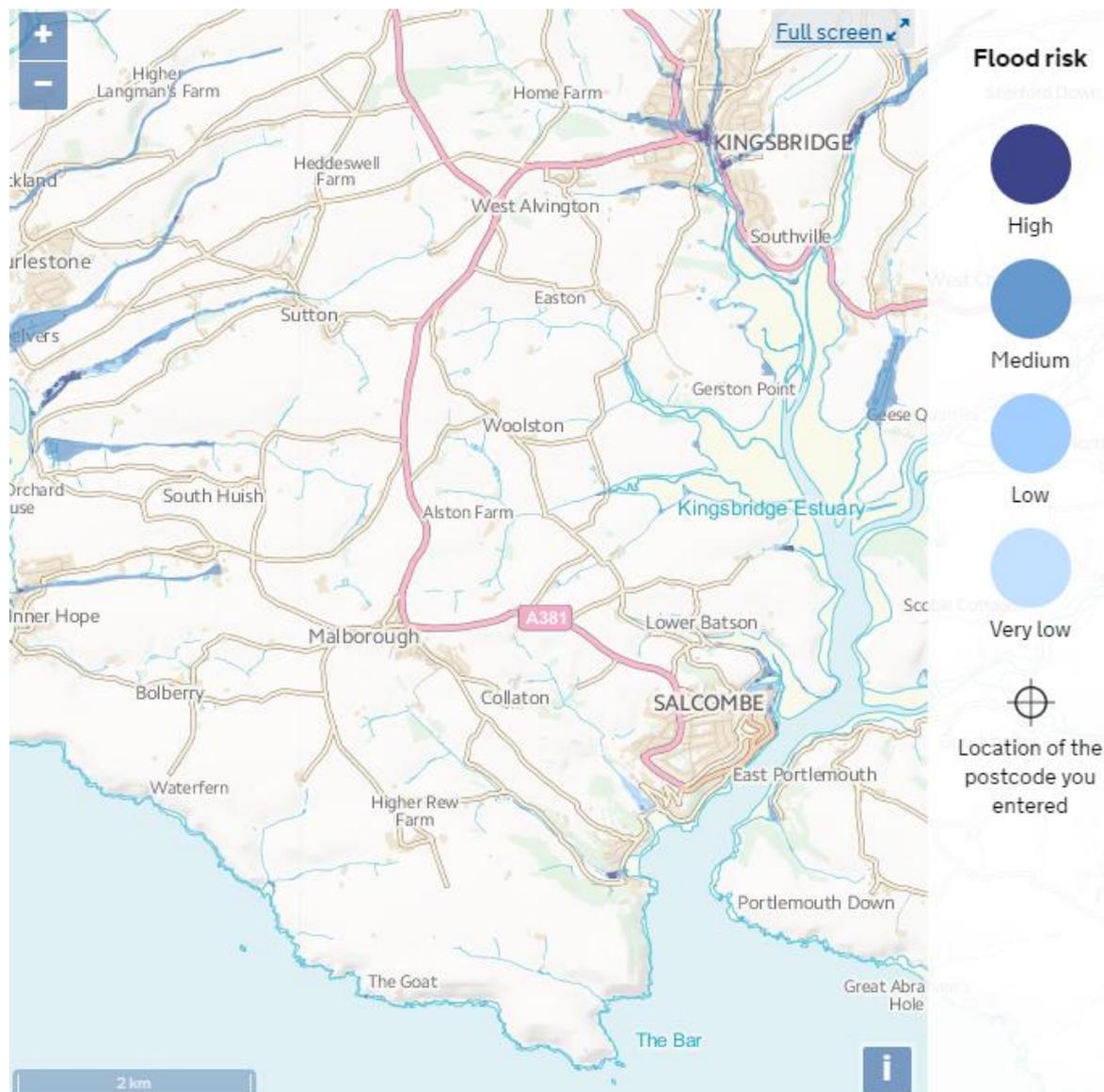


Figure A1: Fluvial flood risk within the Neighbourhood Plan area²⁷

Figure A2 shows that some of the areas within the Neighbourhood Plan area are at medium to high risk of surface water flooding; these areas are along watercourses and minor roads.

²⁷ GOV UK (2017): 'Long term flood risk assessment for locations in England', [online] available to access from: <<https://flood-warning-information.service.gov.uk/long-term-flood-risk/>> last accessed [07/06/17]

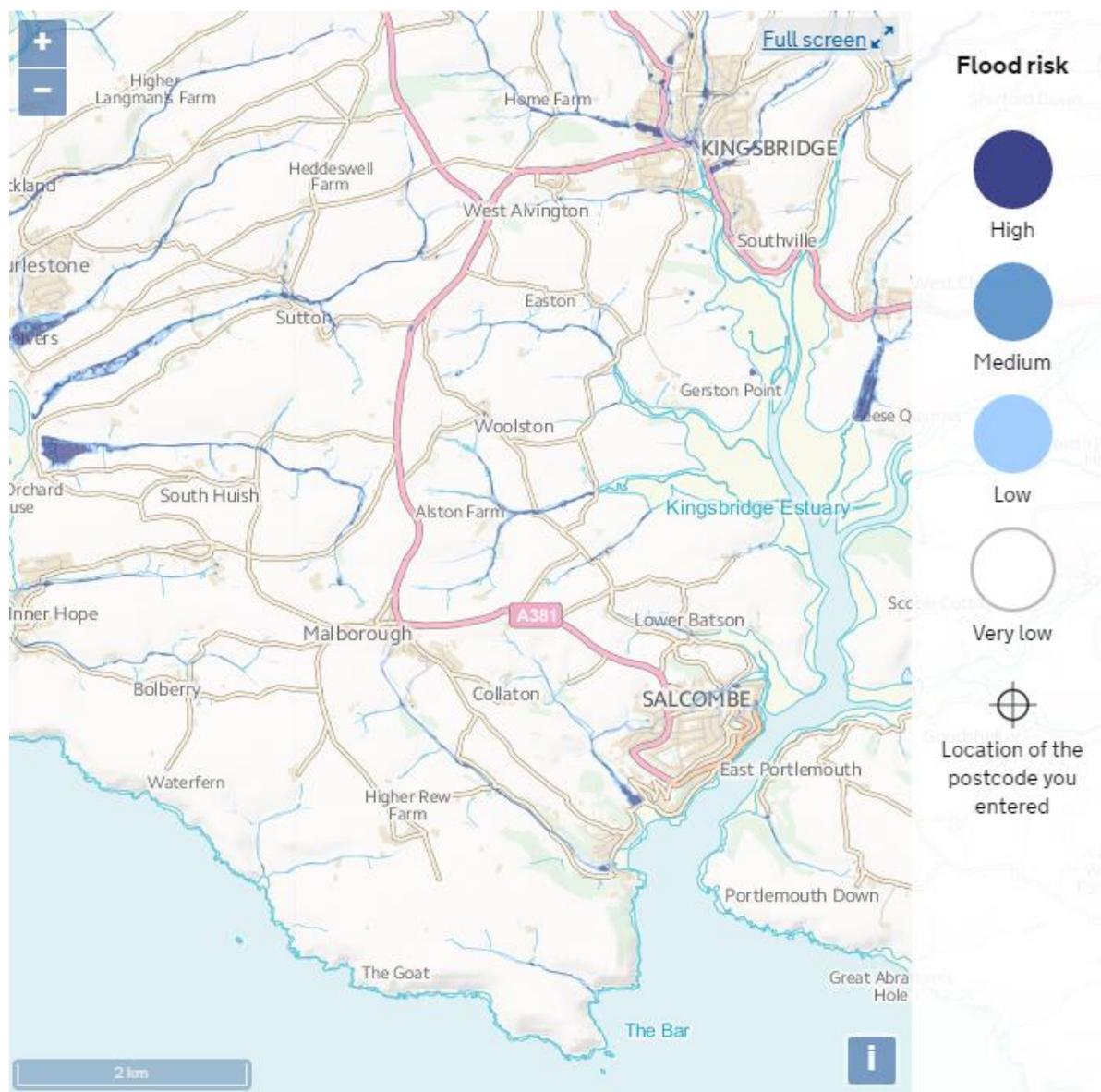


Figure A2: Surface water flood risk within the Neighbourhood Plan area

Greenhouse gas emissions

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

Future Baseline

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

In terms of climate change contribution, GhG emissions generated in the Neighbourhood Plan area may decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in absolute levels of GhG emissions.

A.3 Landscape and Historic Environment

Context Review

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

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government's Statement on the Historic Environment for England²⁸ 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.

At the local level, Core Strategy Policy CS9: Landscape and Historic Environment relates directly to the Landscape and Historic Environment theme. Additionally, the Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV22- Development affecting the historic environment, states: *'Development proposals will need to sustain the local character and distinctiveness of the area and conserve or enhance its historic environment, heritage assets and their settings according to their national and local significance'*. Furthermore the following policies also directly relate to the landscape and historic environment.

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

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

²⁸ HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx last accessed [30/01/17]

Baseline Summary

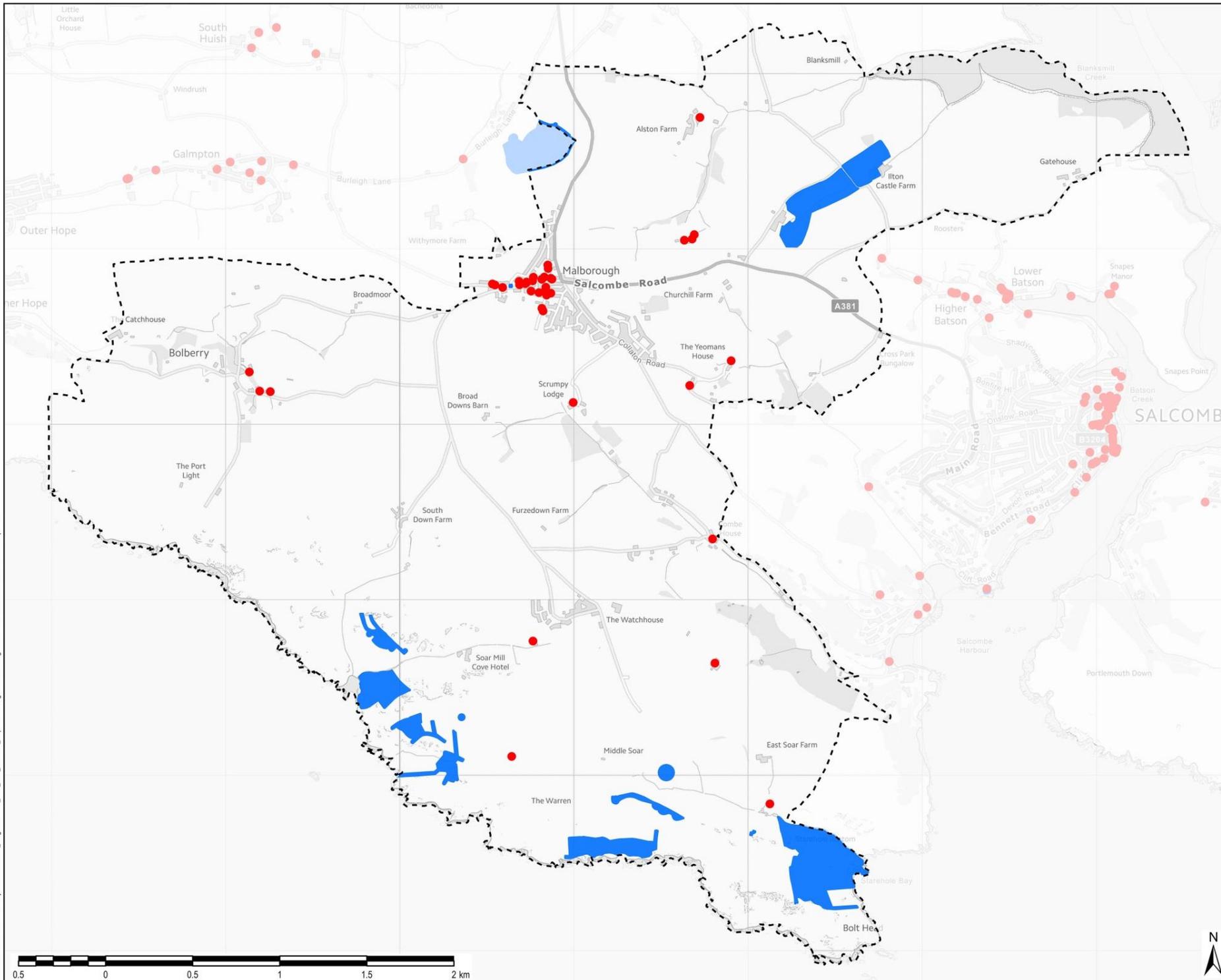
Current baseline

Landscape

The entire Neighbourhood Plan area lies within the South Devon Area of Outstanding Natural Beauty (AONB). The South Devon AONB designated in 1960, is 377km² and covers coastline, estuaries, and countryside, stretching from Plymouth to Brixham. The AONB is managed by a Partnership Committee, made up of local and national organisations, and community representatives.

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Neighbourhood Plan area is located within NCA Profile: 151 South Devon²⁹. The South Devon NCA is described as a plateau, dissected by steep valleys and rivers. The majority of the area consists of mixed farming, with fields bounded by Devon hedge banks and narrow winding lanes. The south of the area contains internationally important coastal and estuarine habitats.

²⁹ Natural England (2014) National Character Area – South Devon. [Online] Available at: <<http://publications.naturalengland.org.uk/publication/1911063?category=587130>> last accessed [25/04/17].



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Malborough Neighbourhood Plan Area
- Listed building
- Record of Scheduled Monument

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Purpose of Issue **DRAFT**

Client **MALBOROUGH NEIGHBOURHOOD PLAN FORUM**

Project Title **MALBOROUGH NEIGHBOURHOOD PLAN**

Drawing Title **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

Drawn CN	Checked JW	Approved NCB	Date 08/06/2017
AECOM Internal Project No. 60538603		Scale @ A3 1:20,000	

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Drawing Number **FIGURE 5.1** Rev **01**

Historic Environment

Figure A2 (above) shows the designated landscapes and historical sites located within the Neighbourhood Plan area.

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. The Neighbourhood Plan area contains two Grade I listed buildings, no Grade II* listed buildings and 38 Grade II listed buildings. The Grade I listed buildings are Church of All Saints, located in Malborough village and Yarde Farmhouse located approximately 900m to the west of Malborough village.

Scheduled monuments are sites of national importance and protected by the Ancient Monuments and Archaeological Areas Act 1979. According to the National Heritage List for England³⁰, there are ten scheduled monuments in the Neighbourhood Plan area, listed below:

- Two hut circles and associated field systems and enclosure at Mousehill Brake;
- Regular aggregate field system 480m west of West Soar;
- Medieval farmstead and field system at Warren Barn, 500m south and 400m south of West Soar;
- Bowl barrow, 210m south of West Soar;
- Field systems, hut circles and four beacons, 510m south of Middle Soar;
- Medieval farmstead, boundary work and earthwork enclosures, 350m south east of Middle Soar;
- Hilltop enclosure, 380m east of Middle Soar;
- Coaxial field system, hut circles and medieval farm buildings at Starehole Bottom;
- Medieval settlement, site of quadrangular castle and relict garden between Ilton Farm and Ilton Castle Farm; and
- Animal pound, 50m south west of All Saints Church, Malborough village.

There are no registered battlefields or registered historic parks and gardens within the Neighbourhood Plan area.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I, Grade II and Grade II* listed buildings, scheduled monuments, Conservation Areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. One listed building and three scheduled monuments within the Neighbourhood plan area feature on the latest Heritage at Risk Register³¹ for South West England, published in October 2016.

Malborough Conservation Area is the only Conservation Area in the Neighbourhood Plan area. The Malborough Conservation Area covers the centre of the village, designated for the distinctive character created by the cluster of properties around the area. A Conservation Area Appraisal and Conservation Area Management Plan do not appear to have been undertaken for either Conservation Area.

Future baseline

New development has the potential to lead to incremental but small changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and visual impact. However, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there is opportunity for new

³⁰ Historic England: National Heritage List for England: <<http://list.historicengland.org.uk>> last accessed [06/06/2017.]

³¹ Historic England (2016): 'Heritage at Risk Register 2016: South West', [online] available to download from: <<https://historicengland.org.uk/images-books/publications/har-2016-registers/>> last accessed [06/06/17]

development to enhance the historic setting of the town and better reveal assets' cultural heritage significance, educating both local residents and visitors to Malborough.

Existing historic environment designations will support a level of protection for key features and areas of historic environment interest in the Neighbourhood Plan area.

A.4 Land, Soil and Water Resources

Context Review

The EU's Soil Thematic Strategy³² presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

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

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Other key documents at the national level include Safeguarding our Soils: A strategy for England³³, which sets out a vision for soil use in England, and the Water White Paper³⁴, 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

³² European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> last accessed [08/06/17]

³³ Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from: <<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [07/06/17]

³⁴ Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [07/06/17]

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 England³⁵ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

At the local level, Core Strategy Policy CS5: Previously Developed Land relates directly to the Land, Soil and Water theme. Additionally, the Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV2 – Air, water, soil, noise and land, states: '*development proposals which will cause unacceptable harm to human health or environmental quality by unacceptable levels of soil, air, water or noise pollution or land instability will not be permitted*'.

Baseline summary

Summary of current baseline

Quality of agricultural land

The Agricultural Land Classification categorises land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. In terms of the location of the best and most versatile agricultural land, the agricultural land in the Neighbourhood Plan area has been categorised as Grade 4 or 5, which is of poorer quality.

Recycling centres

There is no Household Waste and Recycling Centre (HWRC) located within the Neighbourhood Plan area. The nearest HWRC is Torr Quarry, located 7.2km to the north east of the Neighbourhood Plan area, near Kingsbridge.

Watercourses

There are no significant watercourses that flow through the Neighbourhood Plan area, however there are a number of other small waterways networking the Neighbourhood Plan area. Water supply and water provision in the area is provided by South West Water.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. In the Neighbourhood Plan area, there are no SPZs.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. There is one NVZ within the Neighbourhood Plan area, located in the north east corner of the Neighbourhood Plan area - Kingsbridge Eutrophic NVZ.

Future baseline

Due to increasing legislative and regulatory requirements, there are increasing pressures to improving recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality has the potential to be

³⁵ Defra (2011) Government Review of Waste Policy in England [online] available at: <http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf> last accessed [07/06/17]

affected by pollution incidents in the area, the presence of non-native species and future physical modifications to water bodies.

A.5 Population and Community

Context Review

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

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change³⁶ 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

³⁶ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [07/06/17]

central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

At the local level, Core Strategy Policies CS2: Housing Provision, CS6: Affordable Housing, and CS8: Infrastructure Provision relate directly to the Population and Community theme. Additionally, the Plymouth and South West Devon Joint Local Plan 2014-2034 has a range of policies which are related to Population and Community, these are as follows;

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

Baseline summary

Current baseline

Population

Table A1: Population growth 2001-2011³⁷

Date	Malborough	South Hams	South West	England
2001	898	81,849	4,928,434	49,138,831
2011	971	83,140	5,288,935	53,012,456
Population Change 2001-2011	+8.1%	+1.6	+7.3%	+7.9%

According to the most recently available census data (see **Table A1**) Malborough has seen an increase in population (8.1%) between 2001 and 2011, the rate of which is higher than averages observed for the South West (7.3%) and England (7.9%), and significantly higher than the averages for the South Hams.

Age structure

Table A2: Age Structure (2011)³⁸

	Malborough	South Hams	South West	England
0-15	15.0%	15.3%	17.5%	18.9%
16-24	7.8%	8.8%	11.3%	11.9%

³⁷ ONS (no date): Census 2011: Population Density 2011 (Table QS102EW); Population Density 2001 (Table UV02)

³⁸ ONS (no date): Census 2011: Age Structure 2011 (Table KS102EW)

	Malborough	South Hams	South West	England
25-44	18.0%	19.5%	24.6%	27.5%
45-59	21.1%	23.0%	20.1%	19.4%
60+	38.0%	32.8%	26.4%	22.3%
Total Population	971	83,140	5,288,935	53,012,456

The percentage of residents living within the Neighbourhood Plan area aged between 0-24 is 22.8%, which is lower than the average for South Hams (24.1%), and significantly lower than the regional and national averages (28.8% and 30.8% respectively). The biggest proportion of residents within Malborough are aged 60+ (38.0%), which is higher than the average for South Hams (32.8%), and higher than the regional (26.4%) and national (22.3%) counterparts. The working population of Malborough (those residents aged 25-59) is 39.1%, lower than the averages for South Hams (42.5%), the South West (44.7%) and England (46.9%). Therefore, based on the data presented in **Table A2**, Malborough is supporting an older population.

Household deprivation

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

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

Table A3: Relative household deprivation dimensions³⁹

	Malborough	South Hams	South West	England
Household not deprived	41.1%	47.8%	44.8%	42.5%
Deprived in 1 dimension	38.7%	33.5%	33.2%	32.7%
Deprived in 2 dimensions	15.9%	15.5%	17.6%	19.1%
Deprived in 3 dimensions	4.1%	2.9%	4.0%	5.1%
Deprived in 4 dimensions	0.2%	0.3%	0.4%	0.5%

Based on the most recently available census data (see **Table A3**), 58.9% of households within Malborough are deprived in some way, which is 6.7% higher than the average for South Hams (52.2%), and higher than

³⁹ ONS (no date): Census 2011: 'Households by Deprivation Dimensions 2011 (Table QS119EW)

the regional and national counterparts (3.7% and 1.4% higher, respectively). The percentage of households in Malborough which fall within the 'deprived in 1 dimension' and 'deprived in 2 dimensions' categories is greater than the percentages observed for South Hams, the South West and England. 4.1% of the households in the Neighbourhood Plan area are deprived in 3 dimensions, which is similar to the regional average and 1.0% lower than the national average. 0.2% of the households are deprived in 4 dimensions, which is lower than the regional and national averages.

Index of Multiple Deprivation

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

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

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales (see **Table 7.4**).

The Neighbourhood Planning area all lies within E01020172: South Hams 012A.

General Trends

The LSOA performs poorly with regard to indoor living, which falls within the top 10% most deprived areas, as well as for living environment and geographical barriers (20% most deprived). There is also a significant contrast between outdoor (top 10% least deprived) and indoor environment (top 10% most deprived). The LSOA also performs reasonably well in relation to education, health and wider barriers (all within the top 30% least deprived).

Housing tenure

The majority of residents within Malborough (76.3%) own their home outright or with a mortgage, higher than the averages for South Hams (71.7%), the South West (67.4%), and the national average (63.3%). The percentage of residents living in socially rented households is approximately 8.1% which is 3.2% and 5.2% less than the averages for South Hams and the South West respectively. Furthermore, fewer people within Malborough live in privately rented households compared to the regional and national averages.

The average house price in Malborough is £196,528⁴⁰ which is lower than other neighbouring areas such as Salcombe and Galmpton. A Housing Needs Survey⁴¹ for the Neighbourhood Plan area was undertaken in March 2016, and of the 135 residents that responded on the affordability of housing in the area, 55.6% stated that it was affordable to live in the area. However, the Housing Needs Survey also identified that, in January 2016, there were no properties for market sale that were affordable for the majority of first time buyers.

Education

With regards to the most recently available census data, 16.2% of residents within the Neighbourhood Plan area have no qualifications, which is 1.0%, 4.0% and 6.3% lower than the averages for South Hams, the South West and England respectively. The percentage of residents which have Level 4 qualifications (32.3%) is lower than for South Hams (34.3%), this however is 4.9% higher than the averages for this qualification level at regional and national level. The proportion of residents within the Neighbourhood Plan area with a Level 2 qualification (19.2%) is 2.9%, 2.8% and 4.0% higher than the averages for South Hams, the South West and England respectively. The percentage of residents in Malborough who have a Level 1 or 3 qualification broadly aligns with the regional and national averages.

Employment

With regards to the most recently available census data⁴², there is a significantly higher proportion of residents (aged 16-74) in Malborough who are employed in skilled trade occupations if compared to the regional and national averages. The same trend is observed for residents who are employed as managers, directors and senior officials. The proportion of the residents (aged 16-24) working in elementary occupations is broadly aligned with the regional and national averages. Six occupation categories employ fewer residents within the Neighbourhood Plan area compared to the averages for South Hams, the South West, and England, including:

- Process plant/machine operatives;
- Sales and customer service occupations;
- Caring, leisure and other services;
- Administrative and secretarial occupations;
- Associated professional and technical occupations; and

⁴⁰ Rightmove (2017); House Prices in Malborough, Kingsbridge, Devon; [online] available at: <http://www.rightmove.co.uk/house-prices/Malborough.html> last accessed [12/06/17]

⁴¹ SHDC (2016): Malborough Housing Needs Survey [online] available to download from: <http://www.malboroughvillage.org.uk/assets/pdf/yourplan/Malborough%20HNS%20report%20March%2023rd%202016-1%20FINAL.pdf> last accessed [12/06/17]

⁴² ONS (no date): Census 2011: 'Occupation 2011' (Table KS606EW)

- Professional occupations.

The low level of these occupations within the Neighbourhood Plan area may be due to the rural nature of the area, with fewer employment opportunities, and the higher proportion of retired people in the area.

Future baseline

The population of the Neighbourhood Plan area increased between the years 2001-2011 at a higher rate than seen regionally and nationally, and significantly higher than the averages seen for the South Hams. 38% of residents are aged 60+, indicating the presence of an older population within the Neighbourhood Plan area, in common with other areas, the population of the Neighbourhood Plan area is likely to age.

The suitability of housing for local requirements depends in part on the successful implementation of policies outlined in The Plymouth and South West Devon Joint Local Plan 2014-2034.

A.6 Health and Wellbeing

Context Review

Key messages from the NPPF include:

- The social role of the planning system involves ‘supporting vibrant and healthy communities’.
- A core planning principle is to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities’
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.
- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives⁴³ (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

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

The Joint Strategic Needs Assessment (JSNA)⁴⁴ for Devon identifies key features of interest within the area and raises important issues for discussion. The main challenges in Devon have been identified to be

⁴³ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106> last accessed [08/06/17]

⁴⁴ Devon County Council (2015) Joint Strategic Needs Assessment Devon Overview [online] available via: http://www.devonhealthandwellbeing.org.uk/wp-content/uploads/2015/06/JSNA_Devon_Overview_2015.pdf last accessed [08/06/17]

population, equality and diversity, economy, community and environment, deprivation, starting well, living well and ageing well.

At the local level, Core Strategy Policy CS10: Nature Conservation contributes positively to the health and wellbeing theme. Additionally, the Plymouth and South West Devon Joint Local Plan 2014-2034 policy DEV1 – Protecting health and amenity states: '*Development proposals will be required to safeguard the health and the amenity of local communities. In addition to measures set out in other policies of the plan, this will be through, as appropriate:*

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

Baseline summary

Summary of current baseline

Health indicators and deprivation

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing, with elements related to poor housing quality and living environment. Health is generally favourable in the Neighbourhood Plan area, with 80.8% of residents reporting either 'very good health' or 'good health' in the most recent census. Although favourable, this percentage is lower than the averages for South Hams (81.8%), the South West (81.5%) and England (81.4%). Comparatively, 5.3% of residents in the Neighbourhood Plan area report either 'bad health' or 'very bad health', which is 0.4% higher than South Hams and 0.2% higher than the South West, although it is 0.1% lower than the average for England. This is likely to relate to the older population profile of Malborough Parish.

The higher than average levels of 'very bad health' and 'bad health' within the Neighbourhood Plan area aligns with the disability data presented in **Table A4** 19.9% of residents in Malborough reported that their daily activities were limited in some way, which is 0.7% higher than South Hams, 1.4% higher than the South West and 2.3% higher than the average for England.

Table A4: Disability⁴⁵

	Malborough	South Hams	South West	England
Activities limited 'a lot'	8.4%	8.2%	8.3%	8.3%
Activities limited 'a little'	11.6%	11.0%	10.2%	9.3%
Activities 'not limited'	80.1%	80.8%	81.6%	82.4%

⁴⁵ ONS (no date): Census 2011: 'Long-term Health Problem or Disability 2011' (Table QS303EW)

Future baseline

The health and wellbeing in the Neighbourhood Plan area is broadly similar to district and regional comparators, but with fewer residents having 'very good' health when compared with other local, regional and national data.

An ageing population has the potential to increase pressures on community and healthcare services and is therefore a significant influence on the future health and well-being within the Neighbourhood Plan area.

A.7 Transportation

Context Review

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

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008.

The Local Transport Plan 2011-2026 for Devon and Torbay aims to deliver a transport system to meet economic, environmental and social challenges. The plan is seeking to deliver the aspirations of Devon and Torbay councils, stakeholders, businesses and the public. To achieve Devon and Torbay's vision the strategy has five key objectives:

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

At a local level, Core Strategy Policy CS8: Infrastructure Provision relates directly to the transportation theme. Additionally, the Plymouth and South West Devon Joint Local Plan 2014-2034 policy SPT9 – Strategic principles for transport planning and strategy states that the 'Local Planning Authorities and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver an integrated approach to transport and planning, delivering a strategic approach to transport. This is supported by policy DEV32 – Specific provisions relating to transport.

Baseline summary

Summary of current baseline

Rail network

The nearest train stations providing national services are Ivybridge Railway Station, which is located approximately 17.5km to the north west of the Neighbourhood Plan area, and Totnes Railway Station, which is located approximately 21.5km to the north of the Neighbourhood Plan area. Both are on the main Penzance/Plymouth to Exeter railway line, however significantly more services serve Totnes than Ivybridge. Half of the services are operated by Great Western Railway, including main line services to Plymouth, Truro and Penzance to the west and Newton Abbot, Exeter, Taunton, Reading and London Paddington to the

east. The remaining services are run by CrossCountry who operate trains to Plymouth and Cornwall to the west, and Newton Abbot, Exeter, Taunton, Bristol, Birmingham, the north of England and Scotland.

Bus network

There is one main bus route which services the Neighbourhood Plan area;

- 606 Bus: Kingsbridge to Salcombe which stops several times on the A381 Salcombe Road in Malborough run by Tally Ho! Coaches.

This bus route operates from 08:00 19:00 (Kingsbridge to Salcombe) and 08:20 to 19:30 (Salcombe to Kingsbridge), with approximately one service per hour in each direction (less frequently after 14:30) Monday to Saturday. No services operate on Sundays. However the 164 Kingsbridge - Salcombe operates a service on a Sunday and Public Holidays stopping at Malborough at 10:27 and 17:22 with Salcombe - Kingsbridge stopping at Malborough at 10:47 and 17:42. Again, these services are not frequent .

A section of the 162 bus route: Kingsbridge to Hope (via Thurlestone) also operates in the north of the Neighbourhood Plan area, which is run by Tally Ho! Coaches. There are three services per day along this route, operating at approximately 3 hour intervals between 10:30 and 17:30.

Road network and congestion

The main route through Malborough is the A381 Salcombe Road, which connects the village with Salcombe to the east and Kingsbridge to the north road connections to other villages in the Neighbourhood Plan area (e.g. Bolberry) and the south coast.

The A381, as the main route through Malborough village becomes highly congested during summer months. This is due to the increased level of visitor traffic and the particularly narrow and winding section of the road which passes through the centre of Malborough.

Footpath and cycle network

Part of the South West Coast path is situated in the Neighbourhood Plan area; the route follows the coast path from Bolt Tail to Bolt Head. The South West Coast Path also continues in both directions past Hope Cove to the north and round to Salcombe towards the east. An identified problem with the section of the South West Coast Path called 'Bird Walk' is that the pathway is narrow, dark and poorly surfaced, which makes it unappealing for walkers.

Malborough village is linked with Salcombe by a cycle path, with forms part of National Cycle Route 28. Running alongside, and segregated from the A381, this is a key cycle and pedestrian link for residents and visitors.

Availability of cars and vans

In regards to access to vehicles within the Neighbourhood Plan area, the proportion of households with no access to a car or van in Malborough (11.0%) is lower than the average for South Hams (13.3%) and the South West (18.9%), as well as lower than the national average of 25.8%.

Travel to work

Based on the most recent census data⁴⁶, the most popular method of traveling to work in Malborough is via driving a car or van (37.4%) lower than the averages for South Hams (41.1%) and the South West (41.4%). However this is likely to be due to be to the higher levels of residents not in employment. After driving, the second most popular method of travelling to work in Malborough is to work from home, with the value of 10.3%, higher than the averages for South Hams (7.8%), the South West (9.0%) and the national average of 6.9%.

⁴⁶ ONS (no date): Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

Future baseline

New development has the potential to increase visitor numbers, and therefore traffic along the key routes through Malborough with congestion a particular issue in the summer peak season for tourists.

Public transport usage has the potential to remain relatively low compared to private car use in the area, although there is potential to increase sustainable transport use and active travel such as cycling. There is potential for the number of people working from home in Malborough to significantly increase use to modern working patterns such as agile and flexible working.

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

