

Quality information

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Non-technical summary

What is Strategic Environmental Assessment?

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

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

What is the Silverton Parish Neighbourhood Plan?

The Silverton Parish Neighbourhood Plan (SPNP) presents a plan for the administrative area of the Parish for the period to 2033. The SPNP is being prepared to be in conformity with the Mid Devon Local Plan, which was adopted July 2020.¹

The SPNP sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, landscape and village-scape character, the quality of life of residents, and the protection and enhancement of the environment.

It is currently anticipated that the SPNP will be submitted to Mid Devon District Council later in 2022.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (March 2019), which includes information about the Neighbourhood Plan area's environment and community. The second was the SEA Environmental Report to accompany the Regulation 14 consultation version of the Neighbourhood Plan (July 2020).

The purpose of this Environmental Report is to:

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

¹ Mid Devon District Council (2020) Mid Devon adopted Local Plan [online] available at: https://www.middevon.gov.uk/residents/planning-policy/adopted-local-plan-and-policies-maps/#:~:text=The%20Local%20Plan%20will%20guide.in%20the%20most%20sustainable%20places.

The Environmental Report contains:

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

Assessment of reasonable alternatives for the SPNP

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

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

Assessment of housing sites for allocation through the SPNP

The SPNP being prepared in the context of the Mid Devon Local Plan (2020). In accordance with the strategic context of the Local Plan, Mid Devon District Council have confirmed a housing target of 13 dwellings for Silverton Parish. The Local Plan allocates two sites for housing within Silverton Parish (eight dwellings at Land at Old Butterleigh Road; and two dwellings at West's Garage). Both sites have since been consented for a total of seven dwellings (five dwellings at Land at Old Butterleigh Road and two dwellings at West's Garage). This leaves a residual housing need of at least six dwellings.

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

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

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

housing allocations to be taken forward for the purposes of the Neighbourhood Plan. These were:

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

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

To support the consideration of the suitability of these sites, the SEA process (July 2020) undertook an assessment of the key environmental constraints present at each of the six sites and potential effects that may arise as a result of housing development at these locations. In this context the sites were considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping and the baseline information.

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

Table NTS.1 Summary of SEA Site assessment findings

Site	Biodiversity	Climate change	Historic env	Landscape	and water	Population and community	and	Transport
Site A								
Site B								
Site C								
Site D								
Site E								
Site F								



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

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

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

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

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

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

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

an increasingly important biodiversity resource, often providing excellent habitats for wildlife

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

Further assessment work - August 2022

Regulation 14 consultation for the draft SPNP ran from September to November 2021. The draft SPNP proposed the allocation of The Glebe and Tiverton Road, exceeding the housing target set out for Silverton Parish in the Local Plan.

Since this consultation, the Parish Council has considered the representations received. The proposed site allocations were the key issue for the local community and statutory consultees, and there has been much local discussion about the preferred approach for the SPNP, particularly given the Parish's extensive historic constraints.

Historic England suggested through consultation that given the historic sensitivities associated with the proposed site allocations, the historic environment evidence base for the Neighbourhood Plan could be augmented. MDDC concurred with this suggestion.

To support this endeavour, additional assessment work has been undertaken through the SEA. This work highlights key potential heritage issues at alternative site options, with a view to informing the development of plan policies, including associated with historic environment constraints.

Revisiting reasonable alternatives

Since July 2021 the situation in terms of the availability and capacity of site options for consideration through the emerging Neighbourhood Plan has changed. Each site is revisited below:

- West's Garage has planning consent for two homes (as discussed in Section 4.27 within the main report) and can be removed from alternatives.
- Tiverton Road no change in availability/ capacity.
- Roosters no change in availability but site is now being supported for employment
- The Glebe no change in availability/ capacity.
- Hillcrest Mid Devon have zoned as allotments. Site can be removed from alternatives.
- Old Butterleigh Road has planning consent (as set out at Section 4.27 of the main report), now with five homes built, and can therefore be removed from alternatives.

No additional sites have come forward since 2021, and therefore in light of the above, just three sites remain as having potential for allocation through the SPNP. These are Tiverton Road, Roosters, and The Glebe.

Further consideration of historic environment constraints associated with site options.

An initial site visit was carried out by AECOM in July 2022 to inform the detailed heritage assessment of site options. The site visit found that of the three sites, **Roosters** was absent from historic environment constraints. The site is a small brownfield site distant from the historic settlement core, previously a chicken farm, but now in use as light industrial and storage.

As shown in Figure 4.8 of the main report, **Tiverton Road** greenfield site is located adjacent to the north west edge of the village, outside of the settlement area. The site holds historic environment sensitivity, being located within 200m of three Grade II listed buildings. A description of the key heritage assets with the potential to be affected by development at this site are presented in Table 4.8 of the main report. These have been considered in terms of the contribution the site makes to the significance of the heritage asset, and the potential impact of development on the significance of the heritage asset.

As shown in Figure 4.9 of the main report, **the Glebe** greenfield site is located outside of the settlement area on the southern boundary of the village. The site holds historic environment sensitivity, being located partially within the Conservation Area and directly south of the Grade I listed Church of St Mary. A description of the key heritage assets with the potential to be affected by development at this site are presented in Table 4.9 of the main report. These have been considered in terms of the contribution the site makes to the significance of the heritage asset, and the potential impact of development on the significance of the heritage asset.

The preferred strategy for the SPNP

Silverton Parish Council seek to allocate the following for housing development through the Neighbourhood Plan:

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

The Tiverton Road site, with a maximum yield of two dwellings, has been supported by the local community and performed well in the AECOM's site assessment (above) and the Parish Council's Site Assessment, as set out in the Site Assessment and Allocation Report (2016).²

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

It is noted that in light of further consideration of historic environment constraints, the Neighbourhood Plan has been updated to address potential negative effects. Notably this includes changes to policy wording, which is discussed further in Chapter 5 of the main report.

Chapter 5 also provides detailed consideration of the historic sensitivities associated with the proposed site allocations in relation to the site allocation policies. This seeks

² Silverton Parish (2016) Site Appraisal and Allocation Report

to further satisfy Historic England's request for an increased historic environment evidence base, as set out above.

Assessment of the current version of the SPNP

The SPNP presents 23 planning policies for guiding development in the Neighbourhood Plan area.

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

- Biodiversity;
- Climate change;
- Landscape
- Historic environment;

- Land, soil and water resources;
- Population and community;
- Health and wellbeing; and
- Transportation

Conclusions

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

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

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

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

Neutral effects are anticipated against the 'Biodiversity' SEA theme, recognising that potential adverse effects at the Glebe will be suitably mitigated, and wider policy provisions will broadly protect and enhance Silverton's local features and areas of biodiversity interest.

Minor negative effects are anticipated against the 'Historic Environment' SEA, reflecting that 70% of the site falls within the conservation area, contributing somewhat to the significance of the asset. It is recognised that mitigation proposed (design and layout of development, including open space/ green infrastructure provision) will help limit effects at the site level. Specifically, only the less sensitive southern part of the site is being developed for a very limited scale of development.

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

Next steps

When the Silverton Parish Neighbourhood Plan is submitted to Mid Devon District Council (MDDC) for its consideration it will be accompanied by this Report and other relevant documents.. MDDC will consider whether the plan is suitable to go forward to Independent Examination in terms of the Silverton Parish Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan.

The Examiner will be able to recommend that the SPNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. MDDC will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, MDDC will invite the Parish Council 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, MDDC will do so.

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

1. Introduction

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of Silverton Parish's emerging Neighbourhood Plan.
- 1.2 The Silverton Parish Neighbourhood Plan (SPNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Mid Devon Local Plan, with due regard to the emerging Local Plan Review.
- 1.3 This Environmental Report accompanies the submission (Regulation 16) version of the Neighbourhood Plan. A six week Regulation 14 consultation ran from September to November 2021.
- 1.4 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. SEA of the Silverton Parish Neighbourhood Plan is a legal requirement.

SEA explained

- 1.5 The SPNP has been screened in by MDDC as requiring a full SEA to be undertaken. The Screening Report (2018) identifies potential for significant environmental effects to occur from the implementation of the SPNP that were not considered and dealt with by the Sustainability Appraisal of the emerging Local Plan Review.³ Specifically, these environmental effects relate to potential impacts on the setting of a church and conservation area arising from the inclusion of a potential site for housing at the Glebe, Silverton. The screening also states that the SEA process will need to demonstrate that all relevant considerations have been understood and used to inform any allocation at Tiverton Road, Silverton.
- 1.6 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the planmaking process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Silverton Parish Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.7 The SEA has been prepared in conformity with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive⁴.
- 1.8 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely

³ Mid Devon District Council (2018) Silverton Neighbourhood Plan Strategic Environmental Assessment & Habitats Regulation Assessment Screening Report

⁴ Directive 2001/42/EC

significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

Structure of this Environmental Report

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

⁵ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

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

Local Plan context for the Silverton Parish Neighbourhood Plan

- 2.1 The SPNP is being prepared in the context of the Mid Devon Local Plan, which was adopted in July 2020.
- 2.2 The Local Plan will guide development in the district over the next 20 years. It aims to ensure that new homes, jobs and services needed by communities are located in the most sustainable places. It will also help deliver the infrastructure, facilities and other developments needed to make this possible.
- 2.3 Neighbourhood Plans will form part of the development framework for Mid Devon, alongside the 'parent' document the Local Plan. Neighbourhood Plans are required to be in general conformity with the strategic policies of the adopted Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Mid Devon, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.4 The Local Plan Review includes 14 strategic policies. Three of these refer specifically to the main towns of the district where development will be focussed; Tiverton, Cullompton and Crediton. The other 11 provide the strategic context with which the SPNP must conform. Policy S13 (Villages) designates Silverton Parish as a 'village', suitable for a limited level of development, meeting local needs appropriate to its individual opportunities.
- 2.5 In line with Policy S13 "development will be limited to proposals within their defined settlement limits and to allocations for:
 - a. small-scale housing, employment, tourism and leisure;
 - b. Services and facilities serving the locality; and
 - c. Other limited development which enhances community vitality or meets a local social or economic need."
- 2.6 In accordance with the strategic context of the Local Plan, Mid Devon District Council have confirmed a housing target of 13 dwellings for Silverton Parish. This reflects the findings of the local Housing Needs Survey (2016) which indicates that the majority preference, if development is to take place, is for small-scale developments of up to five houses.
- 2.7 The Local Plan Review document allocates two sites for housing within Silverton Parish:
 - 8 dwellings at Land at Old Butterleigh Road, Silverton (Policy SI1); and
 - 5 dwellings at West's Garage, Silverton (Policy SI2).

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

Vision for the Silverton Parish Neighbourhood Plan

- 2.10 Developed during the earlier stages of the preparation of the plan by Silverton Parish Council, the vision for the Neighbourhood Plan is as follows:
 - "Silverton is a rural Parish in the Exe Valley, yet within easy reach of Exeter and other local towns. We seek to protect the special character of both its country setting and ancient heritage, while encouraging the change and development needed to make our Parish a more thriving, more sustainable and safer place for the present community and for those who will live here in the future."
- 2.11 The SPNP's vision is represented by the following set of topic-based themes (Table 2.1). The topics and themes were derived from consultation undertaken on the Neighbourhood Plan and an analysis of information provided.

Table 2.1 SPNP topics and themes

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

3. The scope of the SEA

SEA Scoping Report

- 3.1 The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are Natural England, the Environment Agency and Historic England⁶. These authorities were consulted on the scope of the Silverton Parish Neighbourhood Plan SEA in March 2019.
- 3.2 The purpose of scoping was to outline the 'scope' of the SEA through setting out:
 - A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Additional information on the SEA scope (key issues by theme) are presented in Appendix A.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are also presented in Appendix A.

SEA Framework

3.5 The issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the assessment of likely significant effects on the baseline. The SEA framework for the SPNP is presented in Table 3.2 overleaf.

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

Table 3.2: SEA Framework for the SPNP

SEA Objective

Assessment questions

Biodiversity

Protect and enhance all biodiversity and geological features

Will the option/proposal help to:

- Protect and enhance semi-natural habitats?
- Protect and enhance locally designated sites?
- Achieve a net gain in biodiversity?
- Support enhancements to ecological networks, including through improvements to multifunctional green infrastructure networks?
- Support access to, interpretation and understanding of biodiversity?

Climate change

Promote climate change mitigation in Silverton Parish

Will the option/proposal help to:

- Limit the increase in the carbon footprint of the plan area from population growth?
- Promote the use of sustainable modes of transport, including walking, cycling and public transport?
- Reduce the need to travel?
- Increase the number of new developments meeting sustainable design criteria?
- Generate energy from low or zero carbon sources?
- Reduce energy consumption from non-renewable resources?

Support the resilience of Silverton Parish to the potential effects of climate change

Will the option/proposal help to:

- 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?

Historic environment

Protect, maintain and enhance the rich historic environment within and surrounding the

Will the option/proposal help to:

- Conserve and enhance the Silverton Conservation Area?
- Conserve and enhance listed and locally listed buildings, and their settings, within and surrounding the Neighbourhood Plan area?

Neighbourhood Plan area, including Silverton Conservation Area, further designated and non-designated heritage assets and archaeological assets.

- Conserve and enhance Silverton's local identity and distinctiveness?
- Support access to, interpretation and understanding of the historic environment?

Landscape

Protect and enhance the character and quality of landscapes and village-scapes within and surrounding the Neighbourhood Plan area.

Will the option/proposal help to:

- Conserve and enhance landscape character and features?
- Conserve and enhance village-scape character and features?
- Support the integrity of the Silverton Conservation Area?

Land, soil and water resources

Ensure the efficient and effective use of land

Will the option/proposal help to:

- Promote the use of previously developed land?
- Avoid development of the best and most versatile agricultural land (Grades 2 and 3a land)?

Use and manage water resources in a sustainable manner

Will the option/proposal help to:

- Support improvements to water quality?
- Minimise water consumption?
- Ensure the timely provision of wastewater infrastructure?
- Protect groundwater resources?

Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste Will the option/proposal help to:

- Limit the amount of waste produced and support the minimisation, reuse and recycling of waste?
- Encourage recycling of materials and minimise consumption of resources during construction?
- Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?

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

Will the option/proposal help to:

- 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?

local, high-quality community services and facilities.

Reduce deprivation and promote a more inclusive and self-contained community.

- Maintain or enhance the quality of life of existing local residents?
- Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?
- Support the provision of land for allotments and cemeteries?

Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.

Will the option/proposal help to:

- 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 within the Neighbourhood Plan area

Will the option/proposal help to:

- Promote accessibility to a range of leisure, health and community facilities, for all age groups?
- Facilitate enhancements to the housing stock of the Neighbourhood Plan area?
- 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 recreation?

Transportation

Promote sustainable transport use and reduce the need to travel.

Will the option/proposal help to:

- 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?

Introduction

- 4.1 In accordance with the SEA Regulations, the Environmental Report must include:
 - An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the Silverton Parish Neighbourhood Plan has been informed by an assessment of alternative locations for non-strategic scale development in the Neighbourhood Plan area.

Overview of plan-making / SEA work undertaken to date

- 4.3 Plan-making for the SPNP has been underway since 2015. Initial work incorporated a number of informal and formal consultation exercises carried out by the Parish Council including on the scope of the Neighbourhood Plan.
- 4.4 A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included a range of exhibitions, public meetings and questions and answer sessions as well as workshops.
- 4.5 The following sections discuss the evolution of the SPNP in association with the SEA process.

Assessment of reasonable alternatives for the SPNP

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

Assessment of housing sites for allocation through the SPNP

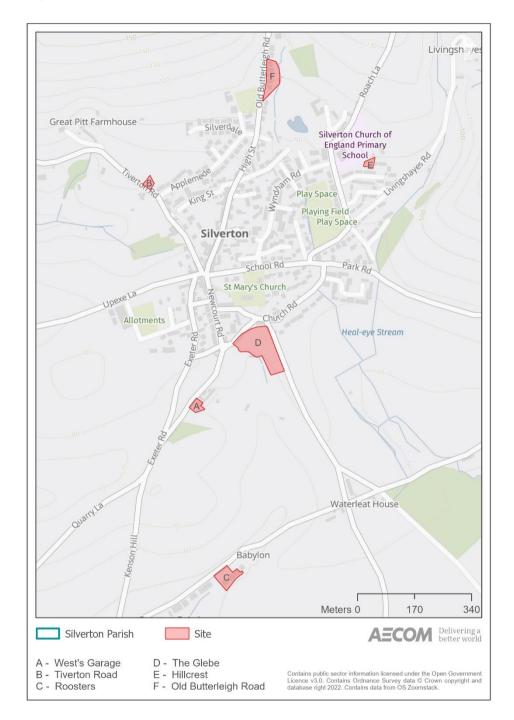
4.8 In support of the development of the Silverton Neighbourhood Plan, a local Housing Needs Survey was undertaken in February 2016, which identified a significant local need for affordable housing. ⁷ However, it is recognised that the main responsibility for ensuring housing needs are met rests with the local

⁷ Silverton Housing Needs Survey (2016)

planning authority. Mid Devon District Council has therefore confirmed that there is no obligation on the Parish Council to use the Neighbourhood Plan to meet the local need for affordable housing either in full or part within the Silverton Neighbourhood Plan area. Housing opportunities in nearby areas and the overall policies for affordable housing provision being pursued by the District Council in different parts of the district can be taken into account, and as such Silverton Parish should not be treated as an isolated housing market.

- 4.9 As discussed in Section 2.1, the Neighbourhood Plan has been prepared in conjunction with the provisions of the existing Local Plan and the emerging Mid Devon Local Plan Review.
- 4.10 In accordance with the strategic context of the Local Plan, Mid Devon District Council have confirmed a housing target of 13 dwellings for Silverton Parish. Additionally, the local Housing Needs Survey (2016) indicates that the majority preference, if development is to take place, is for small-scale developments of up to five houses.
- 4.11 The Local Plan Review document allocates two sites for housing within Silverton Parish:
 - 8 dwellings at Land at Old Butterleigh Road, Silverton (Policy SI1); and
 - 5 dwellings at West's Garage, Silverton (Policy SI2).
- 4.12 Both sites have since been consented for a total of 10 dwellings (5 dwellings at Land at Old Butterleigh Road and two dwellings at West's Garage). This leaves a residual housing need of at least six dwellings.
- 4.13 In June 2020 outline planning was granted on appeal for up to 20 dwellings on the field north of Applemead/ Silverdale. The application drew a large number of objections from the local community, as it does not align with the objectives of the Neighbourhood Plan. Notably, the Neighbourhood Plan seeks to steer away from larger development, and prioritise small development (maximum five dwellings).
- 4.14 While the housing target for the area is now being met and exceeded by the Applemead/ Silverdale site, the Parish Council nonetheless seeks to allocate additional land for new housing through the SPNP. This is with the aim of delivering future housing development that is appropriate in scale so as not to have an adverse effect on the visual amenity and essential infrastructure of the area.
- 4.15 In order to explore potential site options for allocation the Parish Council firstly looked to the SHLAA (2014), and subsequently put out a Call for Sites (CfS) to local landowners (2016). Using the SHLAA and the response to the local CfS, six areas of land in and around the village of Silverton were identified as potential locations for housing allocations to be taken forward for the purposes of the Neighbourhood Plan. These are presented in Figure 4.1 overleaf.

Figure 4.1 Site options



- 4.16 To support the consideration of the suitability of these sites, the SEA process has undertaken an assessment of the key environmental constraints present at each of the six sites and potential effects that may arise as a result of housing development at these locations. In this context the sites have been considered in relation to the SEA Framework of objectives and decision making questions developed during SEA scoping (Section 3.3) and the baseline information.
- 4.17 Table 4.3 overleaf presents summary assessment findings for each of the site options in relation to each of the SEA themes, with detailed assessments presented within Appendix B.

Summary of SEA site findings

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

Table 4.7 Summary of SEA site assessment findings

Site	Climate change	Historic env	Landscape	and water	Population and community	Health and wellbeing	Transport
Site A							
Site B							
Site C							
Site D							
Site E							
Site F							

Key		
Likely adverse effect (without mitigation measures)	Likely positive effect	
Neutral/no effect	Uncertain effects	

- 4.19 Site A followed by Site B were best performing against the SEA objectives, with Sites C and E being the least well performing options. All sites performed positively against the Population and community SEA Objectives given they will contribute positively towards meeting local housing need, however it is recognised that Site C is isolated from the existing settlement. Sites differ in performance against all other SEA Objectives. Taking each in turn:
- 4.20 Positive effects are predicted for Site D and F against Health and Wellbeing as these sites are located adjacent to the village centre, supporting healthy modes of travel for local services, facilities and recreation. Neutral effects are predicted for Sites A and B as these sites are within approx. 10 min walking distance of village services, however the safety of these roads for pedestrians are a concern locally. Sites C and E perform negatively given the distance of the site from the village centre, and the potential loss of community allotment space, respectively. Negative effects are therefore also anticipated for Site C against the Transportation Objective.
- 4.21 Site E also performs negatively against the Transportation SEA Objective due to unconfirmed vehicle access at the site. All other sites are concluded uncertain due to the safety and accessibility points discussed above (in addition to the absence of sustainable travel options).

- 4.22 Sites B, D, E and F perform negatively against the Land, Soil and Water SEA Objective given the likely loss of BMV agricultural land and (in terms of Site E) productive allotment land. Effects are uncertain for Site E in this respect, and likely to be negligible overall given the size of the site and subsequent very limited loss of land. Sites A and C perform positively given they are brownfield sites and would be directing development away from BMV land.
- 4.23 In terms of Landscape, Sites A and B perform positively given they are small and well screened, with Site A being entirely brownfield. Neutral effects are anticipated for Site F given its location nestled between existing development and vegetative screening present. Effects are uncertain for Site E as while a small infill site in the village, localised effects on townscape may result. Site C performs least well in this respect, given its location in the open countryside away from the existing settlement.
- 4.24 Site D performs negatively against the Historic Environment objective given the site is partially within the Silverton Conservation Area, and potential effects on long distance views and the setting of church tower of St Mary the Virgin (Grade I Listed) as set out in the Silverton Conservation Area Appraisal. Sites A and F also have the potential to impact upon the Conservation Area, however effects are currently uncertain at this stage. Additionally, development of this brownfield site offers the potential to deliver enhancements to the quality of the built environment which benefits the setting of the historic environment, if high quality design and layout are incorporated within new development. Neutral effects are anticipated for Sites B, C, and E given that no historic environment designations are present in the setting of the sites.
- 4.25 All sites with the exception of Sites E and F are uncertain against the Biodiversity SEA objective given development may adversely impact upon habitats (and any associated species) present at the site, notably hedgerows, trees and dense scrub along site boundaries. Site F performs negatively given evidence indicates the presence of protected species (dormice) along the eastern boundary. Site E performs negatively as is currently in use as allotment space. Allotments are an increasingly important biodiversity resource, often providing excellent habitats for wildlife.
- 4.26 In terms of the Climate Change SEA objective, uncertain effects are anticipated for Site A given the surface water flood risk present at the site. All other sites are concluded as neutral given that impacts on greenhouse gas emissions are likely to be insignificant.

Further assessment work - August 2022

- 4.27 Regulation 14 consultation for the draft SPNP ran from September to November 2021. The draft SPNP proposed the allocation of The Glebe and Tiverton Road, exceeding the housing target set out for Silverton Parish in the Local Plan.
- 4.28 Since this consultation, the Parish Council has considered the representations received. The proposed site allocations were the key issue for the local community and statutory consultees, and there has been much local discussion about the preferred approach for the SPNP, particularly given the Parish's extensive historic constraints.

- 4.29 Historic England suggested through consultation that given the historic sensitivities associated with the proposed site allocations, the historic environment evidence base for the Neighbourhood Plan could be augmented. MDDC concurred with this suggestion.
- 4.30 To support this endeavour, additional assessment work has been undertaken through the SEA. This work highlights key potential heritage issues at alternative site options, with a view to informing the development of plan policies, including associated with historic environment constraints.

Revisiting reasonable alternatives

- 4.31 Since July 2021 the situation in terms of the availability and capacity of sites options for consideration through the emerging Neighbourhood Plan has changed. Each site is revisited below:
 - West's Garage has planning consent for five homes (as discussed in Section 4.27 above) and can be removed from alternatives.
 - Tiverton Road no change in availability/ capacity.
 - Roosters no change in availability but site is now being supported for employment
 - The Glebe no change in availability/ capacity.
 - Hillcrest Mid Devon have zoned as allotments. Site can be removed from alternatives.
 - Old Butterleigh Road has planning consent (as set out at Section 4.27 above), now with five homes built, and can therefore be removed from alternatives.
- 4.32 No additional sites have come forward since 2021, and therefore in light of the above, just three sites remain as having potential for allocation through the SPNP. These are Tiverton Road, Roosters, and The Glebe.

Further consideration of historic environment constraints associated with site options

4.33 An initial site visit was carried out by AECOM in July 2022 to inform the detailed heritage assessment of site options. The site visit found that of the three sites, Roosters was absent from historic environment constraints. The site is a small brownfield site distant from the historic settlement core, currently in use as a chicken farm (see Figure 4.2 overleaf).



Figure 4.2 Roosters

- 4.34 The Roosters site does not fall within the Silverton Conservation Area, nor is it considered within the setting of, or relates to the historic significance of, the Conservation Area. No nationally listed buildings are present on the site, nor is the site within the direct setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of the site. No features listed on the Devon HER are present on or adjacent to the site.
- 4.35 Detailed assessments have therefore been carried out overleaf for the remaining two sites only, Tiverton Road and The Glebe, given both sites have heritage constraints which should be considered in more detail.

Tiverton Road

4.36 As shown in Figure 4.3 overleaf, the greenfield site is located adjacent to the north west edge of the village, outside of the settlement area. The site holds historic environment sensitivity, being located is within 200m of three Grade II listed buildings. A description of the key heritage assets with the potential to be affected by development at this site are presented in Table 4.8 overleaf. These have been considered in terms of the contribution the site makes to the significance of the heritage asset, and the potential impact of development on the significance of the heritage asset.



Figure 4.3 Tiverton Road site and surrounding heritage assets

Table 4.8 Historic environment constraints associated with Tiverton Road

Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Potential impact of development on significance.
Silverton Conservation Area - incorporates the historic core of the village and contains over 60 statutorily protected heritage assets, mostly dating from the late medieval period and includes the Parish Church of St Mary, Grade I Listed.	The site is located 70m from the Conservation Area (CA), on the settlement edge to the north west of the village. The CA at this location falls within the Tiverton Road and Exeter Road character area, which is defined as' tranquil and rural in nature'. Views to the north, west and south of the surrounding countryside provide a rural feel, contributing to significance as part of the agricultural context of the conservation area. A large portion of this character area is within the historic core of the village, with historic dwellings fronting onto the street. Notably, Three Tuns House(what was previously the Three Tuns Public House - see Figure 4.4 below) is in a prominent position along Exeter Road. It is part of a row of historic buildings which make an attractive contribution to the significance of the conservation area.	Development on the site may urbanise the approach to the CA along Tiverton Lane, changing the perception of the CA through extending the developed edge. However, given that the site is relatively well screened from the CA; that there is existing built form to the east; and that planning permission for residential development has been granted to the adjoining large greenfield site, any impact on the significance of the CA is likely to be minor. Furthermore, given the small size of the site (0.07ha), and when comparing to the size of conservation area, it is

The conservation area appraisal (CAA) draws attention to the 'rural backdrop' of the CA, identifying views and vistas obtained both in and out of the CA which significantly contribute to its character and feel. Furthermore, the CAA states that development on the periphery of the village could be a threat to views.

Views of the surrounding countryside can be seen in small sections of the CA between buildings, and in some areas over buildings to the north, west and east. Long panoramic views have been identified from the CA from King Street to the north and west (see map 9 within the CAA). However, the location of the site on the east of Tiverton road is not likely to intercept these views, with vegetive screening further reducing the potential for adverse effects in this respect (see Figure 4.5 below).

not considered that development would constitute a significant change to the setting of the conservation area. Development would likely result in a **Low adverse impact** on part of the conservation area which is of **Medium significance**.



Figure 4.5 Vegetative screening at Tiverton Road site

Furthermore, development would be in keeping with existing residential dwellings to the east, and further south along Tiverton Road towards the

dwellings to the east, and further south along Tiverton Road towards the village centre on the edge of the CA. Figure 4.6 below is taken from the site, southeastwards towards the main village (and conservation area), and demonstrates the limited views at this location.



Figure 4.6 View from Tiverton Road site towards village Impacts on the conservation should also be seen in the context of the more significant development which will come forward as a result of the planning permission granted at the larger adjacent field (see Figure 4.7 below).



Figure 4.7 site with planning permission adjacent to the Tiverton Road site option

Great Pitt Farmhouse Grade II* Listed Building - The farmhouse was built C15 with later alterations. Formerly a 3-room, through- passage plan, with continuous rear outshut under catslide roof, and with a later (C19) left hand extension.	The site is 230m south of the listed Farmhouse. The topography of the area reduces the potential for the site to impact on views or setting, given that the asset is on much higher ground than the site. The distance of the site from the listed farmhouse, and its limited visibility means that the site does not contribute to the listed building's significance.	Development of the site would have a Very Low adverse impact on an asset of medium significance .
Grade II Listed Barn 40m south west of Great Pit Farmhouse - Barn with engine house. C17 and C19.	The site is 230m south of the listed Barn. Farm buildings were converted to domestic use in the 1990s. The topography of the area reduces the potential for the site to impact on views or setting given that the asset is on much higher ground than the site. The distance of the site from the listed farmhouse, and its limited visibility means that the site does not contribute to the listed building's significance.	Development of the site would have a Very Low adverse impact on an asset of medium significance .
Grade II listed buildings along Tiverton Road: Applegarth - Mid C19 detached cottage. The building is plastered cob with stone footings, gable-end thatched roof, and end stacks with brick shaft.	The site is located 90-115m north west of the listed buildings, and is not particularly visible from the assets. The village moderately slopes up from the assets at the bottom of Tiverton Road towards the site further north along Tiverton Road out of the village. The site is well screened from the assets (see Figure 4.8 and Figure 4.9 below), with limited views. Furthermore, the site does not provide a historic link to the listed buildings in terms of their significance. In light of the above and given the small size of the site (0.07ha), a very small number of new homes at this location is unlikely detract from the setting of the listed buildings.	The site is part of the agricultural setting of the listed buildings but is well screened with limited views. Development is therefore unlikely to impact on the significance of assets along Tiverton Road. It is
Arden House, 1 and 2 - Possibly late C17 or early C18 detached cottage. The building is roughcast cob with stone footings and gabled-	buildings.	considered that development on the site would constitute a Very low adverse impact on

end thatched roof. A simple two-celled dwelling, with corner stack, occupying corner site. Two-storeys.

Briar Cottage - This late C17 cottage was formerly two units, with the western part probably being the earlier.



Figure 4.8 Arden House Grade II Listed Building



Figure 4.9 Tiverton Road with Briar Cottage at the far extent

heritage assets of Medium significance.

Features listed on the Historic Environment Record: Former Orchard - Orchard banks of probable post-medieval to early 20th century date were visible as earthworks on aerial photographs of 1946 to the north-west of High Street, Silverton	The site is 170m west of the former orchard. Local knowledge suggests that the earthworks have since been developed with housing. It is therefore considered that the site makes a negligible contribution to the significance of the heritage asset.	Development of the site would have no impact on an asset of Low significance .
Features listed on the Historic Environment Record: Catch Meadow South of Ash Farm - A catch meadow of probable post- medieval to 19th century date was visible on aerial photographs of the 1940s onwards as earthwork gutters to the south of Great Pitt Farmhouse. The earthworks are clearly visible on images derived from lidar data	The site is 200m from the asset, across Tiverton Road. Given the site's topography and the presence of Tiverton Road between the asset and the site, the site is considered to make a negligible contribution to the significance of the heritage asset.	Development of the site would have no impact on an asset of Low significance .

The Glebe

4.37 As shown in Figure 4.10 below, the greenfield site is located outside of the settlement area on the southern boundary of the village. The site holds historic environment sensitivity, being located partially within the Conservation Area and directly south of the Grade I listed Church of St Mary. A description of the key heritage assets with the potential to be affected by development at this site are presented in Table 4.9 overleaf. These have been considered in terms of the contribution the site makes to the significance of the heritage asset, and the potential impact of development on the significance of the heritage asset.

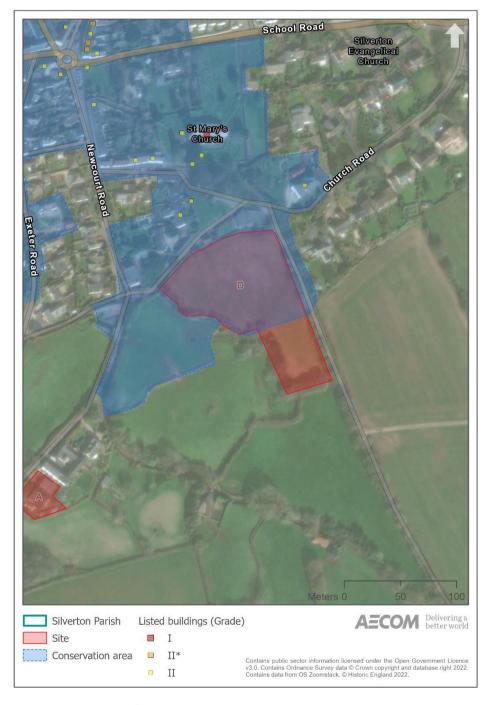


Figure 4.10 The Glebe site and surrounding heritage assets

Table 4.9 Historic environment constraints associated with Tiverton Road

Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Potential impact of development on significance.
Silverton Conservation Area - incorporates the historic core of the village and contains over 60 statutorily protected heritage assets, mostly dating from the late medieval period.	As shown in Figure 4.10 above, a large proportion of the site (approximately 70%) is located within the Conservation Area (CA) on the southern boundary of the village. While the site is outside of the defined historic core (see Silverton conservation area appraisal (CAA)), the CAA identifies that the 'rural backdrop and views and vistas obtained both in and out of the Conservation Area significantly contribute to its character and feel.' Specifically, the area of the site falling within the CA, is identified as a 'unlisted space of merit' within the CAA. The CAA highlights that these spaces 'add interest and make a positive contribution to the character and appearance of the conservation area.' The site falls within the Church and Berry character area, which is historically the oldest part of the settlement. Outside of the site, the Berry is the green area immediately south of the churchyard, which is highly valued for its contribution to the setting of the CA. Notably the trees in this area have a high amenity value, many of which are protected by Tree Preservation Orders (TPOs). Figure 4.11 overleaf shows the site from its northern extent, within the CA, and with views towards Church Road, the Church, and the wider historic core. Figure 4.11 shows the site at this extent is open in nature, and while the site is relatively screened (mature trees) (Figure 4.11 and 4.12), this screening would seasonally be absent and views of the Church from the site would be much greater/ significant. It is further recognised that St Mary the Virgin Church holds a prominent position in the highest ground above The Berry, visible from the site.	Development of the site would extend the southern edge of the village, changing the context of the gateway into the CA from agricultural context to suburban. The effect would be to divorce the southern part of the CA its agricultural context with which it has been traditionally associated. The character and setting of the CA would be noticeably different, and its heritage value would be affected. The positive contribution that the 'unlisted space of merit' (the north of the site) makes to the



Figure 4.11 The Glebe



Figure 4.12 Vegetative screening at The Berry and view of Church Road
The Church Yard is one of the largest open spaces within the CA, providing a
setting for the Grade I Listed Church. It contains a Listed chest tomb and
Preaching Cross (which is also a Scheduled Ancient Monument) and a large

character and appearance of the CA would be lost/ significant altered. Specifically, long distance views of/ from the Grade I listed church would be affected, with further impact on the setting of assets in the oldest part of the settlement.

The southern boundary of the CA falls within the site, which is an important feature of the CA. The CAA highlights that boundaries can be under threat from the formation of new accesses, poor maintenance, or from new development. Furthermore, the CAA highlights that 'there is very little opportunity for development within this character area', stating that modern development

Yew tree and is bounded by a Listed wall (see Figure 4.13 below). The site contributes to the significance of the CA's setting as part of its rural context.



Figure 4.13 Churchyard

The site is relatively open and visible from the historic core, with a rich tree line extending along the southern extent of the site. Figure 4.13 overleaf shows the openness of the site and the vegetative screening present along the southern boundary. Screening is likely to limit long distance views south of the site, outside of the CA.

to the east has had a particularly negative effect on the rural setting of the church'. Development of the site therefore has the potential to impact upon the significance of the CA in this respect, extending the developed edge and impacting on important views and rural setting.

The resulting impact would be **Medium** adverse on the CA which is a heritage asset of **Medium** significance.

Development within the conservation area will most likely need an archaeological survey as this area is historically sensitive. The resulting impact of development is currently uncertain



Figure 4.14 The Glebe

Historic maps indicate that the CA (and therefore the site) may contain evidence of former historic field boundaries, which would survive as in-filled ditches and may provide evidence for early land division and property division. However, it is noted that the historic core has the highest potential for the presence of belowground archaeological deposits, which does not include the site.

Church of St Mary the Virgin (Grade 1 listed building): Parish Church dating from the C15, C16, and C17. North aisle added circa 1478 (its erection mentioned in the will of John Suffmore, the rector); north chancel chapel early C16.

The site is within the setting of the Church of St Mary the Virgin, with good visibility between the asset and the site, particularly during winter. The church tower of St Mary the Virgin (Figure 4.15 overleaf) can be seen from the majority of the conservation area and is a significant landmark in Silverton and the surrounding countryside. The site, like much of the land to the south of the village, formerly comprised church lands.

The setting of the church has the potential to be changed by development on the site, depending on the design and layout of new homes; recognising that the proposals have the potential to include areas of green space. Development of the part of the site within

until surveys have been undertaken.



Figure 4.15 Church including tower of St Mary

Being partially within the CA the site is part of the setting of the Church of St Mary's, with Map 9 of the CAA identifying long panoramic views from the edge of the site towards the church (see Figure 4.15 overleaf).

It is noted that views shown within Figure 4.15 are currently limited due to mature trees providing screening at The Berry. Seasonally (i.e. in winter and early spring), this screening would be less effectual, and views of the Church from the site would be much greater/ significant. The church draws on both the village and surrounding agricultural land for its significance and the site is contributor.

the conservation area (i.e. in the northern part of the site) has particular potential to impact on the setting and wider historic significance of the church. Impact on the Church of St Mary the Virgin would therefore be Medium adverse on an asset of High significance.



Figure 4.16 The Glebe with views towards the Church

Features listed on the Historic Environment Record: Orchard Banks South of Silverton: Earthwork banks were visible to the south of Silverton on digital images derived from lidar data. They were part of a former orchard of probable post-medieval date.

Features listed on the Historic Environment Record: Orchard Banks South of

This feature listed on the HER covers the entirety of the site. Given the site is currently used for grazing it is considered that earthwork features are unlikely to be visible on the ground and in poor condition (see Figure 4.16 below).



Figure 4.17 The Glebe site

Development of the site (wholly or partially) would be a significant alteration to the feature, given it spans the entirety of the site. However. given features are unlikely to be visible, development also offers the potential for better understanding of this asset. A Medium adverse **impact** is therefore predicted on this heritage asset of **Low** significance.

Grade II listed buildings at 6 and 8 Church Road: Nos. 6 and 8 - (formerly listed as Berry Villa) 5.4.66 GV II 2 dwellings, formerly a farmhouse known as 'The Berry'. C17, perhaps earlier, much altered.

Grade II listed gate piers in front of no. 8: Two late C17 or early C18 gate piers.

The listed buildings are located within 30m of the site to the north west. In addition to two residential dwellings, Grade II listed gate piers are located in front of No. 8 Church Road. As shown in Figure 4.17 below, the buildings are relatively well screened by planting and hedgerows, with walls also providing important enclosure.



Figure 4.18 Grade II listed building – Church Road

The trees in the Berry also contribute positively to the setting of the buildings (Figure 4.10 and 4.11 above).

However due to the sloping topography and relatively openness of the site, it is considered that development would impact upon the setting of assets and local views (Figure 4.18 overleaf).

Development of the site would have impacts on the setting of the listed buildings and views to and from the site. While the assets are partially, and seasonally, screened. development is considered likely to result in **Medium** adverse impacts on listed buildings, as assets of **Medium** significance. However, effects depend on the design and layout of development, recognising that a significant proportion of the site is to be developed as green space. In this context an allocation offers some potential to enhance the setting of the listed buildings.

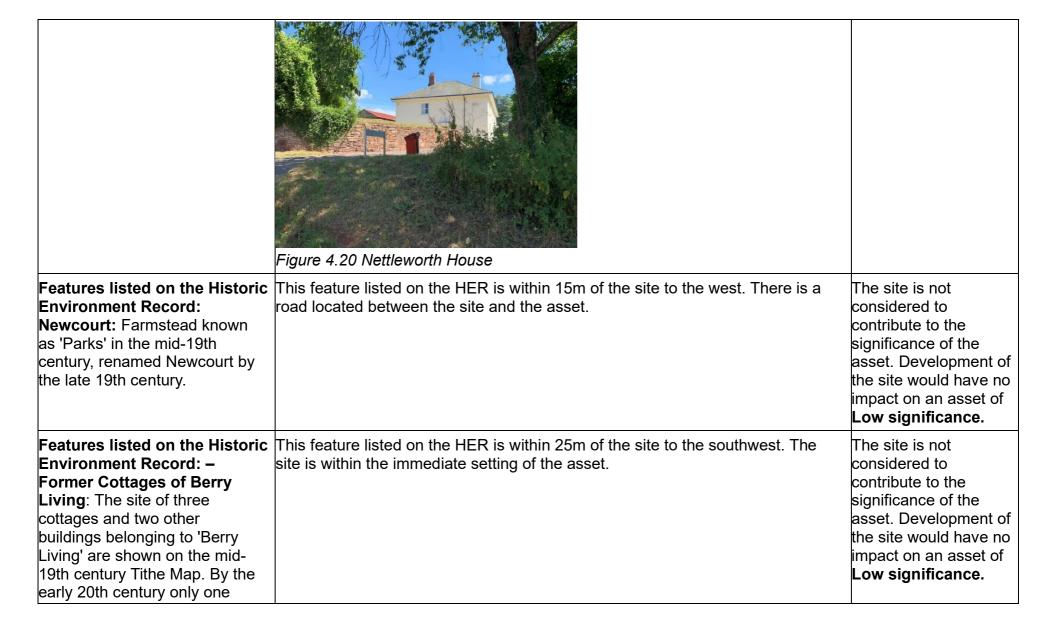


Figure 4.19 View from the centre of the site north towards Church Road

Nettleworth House Grade II listed building Early C19 detached house. The building is stone and cob, partly plastered, under hipped slate roof, with overhanging eaves and moulded gutter box.

While the site is within 45m of the listed building, mature trees and hedgerows screen the site along Church Road and along the eastern site boundary. There is limited visibility between the site and the asset, and the presence of Church Road minimises the contribution of the site to the asset's setting (see Figure 4.20 overleaf) The site also does not have direct historic links with Nettleworth House (formerly Berry Villa).

The site is not part of the setting of the listed building.
Development of the site would have no impact on an asset of Low significance.



small building remained, with no visible remains existing today.		
Features listed on the Historic Environment Record: Hinds: Former farmstead shown on the north side of the road on mid-19th century map. Only one building remained by the late 19th century, but this was also removed by the early 20th century.	of the wider rural, agricultural setting of the former asset.	Development of the site could urbanise the wider setting of the site of the former asset. It is recognised that the condition of the asset has been reduced over time which may reduce the significance of any impact on the asset. A Very Low adverse impact is predicted on an asset of Very Low significance.
Features listed on the Historic Environment Record: Crosses or Warrens: Former farmstead, with a house and other buildings on the north side of the road, and a large barn and yard on the south side of the road, shown on mid-19th century map. Replaced by a new farmstead called Channon's by the late 19th century.	This feature listed on the HER is 120m southwest of the site. The site formed part of the wider rural, agricultural setting of the former asset.	Development of the site could urbanise the wider setting of the asset. The replacement of the farmstead in the 19th century may reduce the significance of any impact on the asset. A Very Low adverse impact is predicted on an asset of Very Low significance.

The preferred strategy for the SPNP

- 4.38 Silverton Parish Council seek to allocate the following for housing development through the Neighbourhood Plan:
 - The Glebe (5 dwellings); and
 - Tiverton Road (2 dwellings).
- 4.39 The Tiverton Road site, with a maximum yield of two dwellings, has been supported by the local community and performed well in the AECOM's site assessment (above) and the Parish Council's Site Assessment, as set out in the Site Assessment and Allocation Report (2016).8
- 4.40 The Glebe has been proposed for a small-scale residential development which will enable community access to the rest of the site for recreation purposes (an area of public open space of at least 0.5 ha including the planting of native tree species and hedging to create a community woodland). The site is allocated for five dwellings.
- 4.41 It is noted that in light of further consideration of historic environment constraints above, the Neighbourhood Plan has been updated to address potential negative effects. Notably this includes changes to policy wording, which is discussed further in Chapter 5.
- 4.42 Chapter 5 also provides detailed consideration of the historic sensitivities associated with the proposed site allocations in relation to the site allocation policies. This seeks to further satisfy Historic England's request for an increased historic environment evidence base, as set out in Section 4.29 above.

Initial appraisal of the SPNP and Neighbourhood Plan policies

- 4.43 In July 2020 AECOM appraised an initial draft of the Pre-Submission Regulation 14 Neighbourhood Plan, providing the following recommendation:
 - The Tiverton Road Development Sites (Policy HS04) could be revised to support habitat restoration and habitat re-creation at the site, in addition to an overall commitment to net-gain. This would contribute positively towards maintaining and enhancing the local biodiversity offer of Silverton Parish.
- 4.44 The Parish Council subsequently updated the draft Neighbourhood Plan to address this recommendation, and in light of responses received from the local community and other interested parties through consultation. Key changes to the submission version of the SPNP (July 2022) includes the addition and amendment of Neighbourhood Plan policies.
- 4.45 The final list of policies included in the submission version of the SPNP are set out in Table 4.10 overleaf.

⁸ Silverton Parish (2016) Site Appraisal and Allocation Report

Table 4.10 SPNP policies

Natural I	Environment
EN01	Retaining and Enhancing the Natural Environment
EN02	Rights of Way (Public Footpaths, Bridleways and Cycleways)
EN03	Local Green Space
EN04	Minimising Flood Risk
Built En	vironment
BE01	Local Character and Design Standards
BE02	Local Heritage
Housing	
HS01	Scale of Housing Development
HS02	Meeting Local Housing Need
HS03	The Glebe Housing Development Site
HS04	Tiverton Road Development Site
HS05	Community Housing
HS06	Parking Spaces on Housing Developments
Busines	s and Jobs
BJ01	Roosters, Babylon Road Employment Site
BJ02	Super-fast Connectivity
BJ03	Home Working
Traffic a	nd Travel
TR01	Non-Car Travel
TR02	Pedestrian Link to Main Road
TR03	Traffic Management
TR04	Off Road Parking
TR05	Vehicle Sharing
Commu	nity Spaces and Activities
CS01	Existing Community Facilities and Assets
CS02	Existing Recreation Spaces
CS03	New Public Open Space

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

Introduction

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

Methodology

- 5.2 The assessment is structured under the eight SEA themes. For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.⁹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.3 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity

- 5.4 There are no internationally or nationally designated sites within Silverton Parish. However Killerton Site of Special Scientific Interest (SSSI) is located within 100m of the Neighbourhood Plan area, to the south. The Neighbourhood Plan area does not fall within a SSSI Impact Risk Zone (IRZ) for residential development, rural residential development or rural non-residential development relating to this site. It is therefore not considered that the SPNP will lead to adverse effects on nationally designated sites.
- 5.5 The Neighbourhood Plan area contains locally designated sites and a variety of BAP Priority Habitats and Species. Ancient woodlands and copses, mature trees, hedgerows and Devon banks are all noted in the LCA (2011) as being major contributory factors to the distinct special quality of the area. The SPNP therefore sets out a range of provisions to help limit potential effects of

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

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

new development on features and areas of biodiversity interest in the Neighbourhood Plan area, and supports enhancements where possible. Specifically, Policy EN01 (Retaining and Enhancing the Natural Beauty of our Parish) states that "where changes to existing traditional Devon banks is unavoidable, proposals for development which affect traditional Devon hedges will only be supported where they have demonstrated that options have been assessed and, as a result, have proposed the least damaging option (to the hedgerow / bank, setting in the landscape, biodiversity and habitats)."

- 5.6 The protection and enhancement of local biodiversity features is further supported by the policy provisions which safeguard open spaces. For example, Policy EN03 (Local Green Space) designates nine sites within the Neighbourhood Plan area for their recreational and amenity value, with proposals for development "ruled out other than in very special circumstances". In this context, Policy CS02 (Existing Recreation Spaces) also seeks to safeguard existing areas used by the local community for recreational purposes. The protection of these spaces will strengthen locally important areas of biodiversity and aid connectivity through maintaining natural features and ecological corridors.
- 5.7 Policy CS03 'New Public Open Space' supports the provision of new public open space on land at the Glebe. In accordance with community consultation responses, provision of a community orchard will be supported at the Glebe, promoting the enhancement and enjoyment of this space. This is reiterated through Policy HS03 (The Glebe Housing Development Site) which sets out the provision for "an area of public open space of at least 0.5 ha, including the planting of native tree species and hedging on boundaries." The incorporation of biodiversity features into development will lead to a positive effect on biodiversity through retaining and enhancing important natural features and further preventing loss of key habitats, stating that the subdivision of existing plots will only be permitted where "significant features such as trees, hedges or stone walls are preserved."
- 5.8 A further key Neighbourhood Plan policy for promoting ecological networks will also be Policy EN02 (Rights of Way (Public Footpaths, Bridleways and Cycleways Network), which seeks to "protect and/or enhance the value of the rights of way as a biodiversity corridor". This capitalises upon the findings of the Devon Biodiversity Records Centre Report (2014) which emphasised for the SPNP that linear green features provide important habitats and feeding routes for wildlife.¹¹
- 5.9 In terms of site allocations, the positive effects anticipated as a result of development at The Glebe are discussed above. However it is also recognised that the site is bounded by hedges and trees on all sides, with an area of Priority Habitat Inventory 'No main habitat but additional habitat exists' located adjacent to the site, to the south. Therefore, development has the potential to result in damage to/ loss of these habitats and any associated species. Criteria set out within Policy HS03 (The Glebe Housing Development Site) requires that "the development minimises the loss of existing trees and hedges and include additional planting and other measures to ensure a net gain in biodiversity".

¹¹ Wildlife Site Resource Map and Species Information for Neighbourhood Planning

- 5.10 The National Planning Policy Framework (NPPF) (2021) states that planning policies and decisions should contribute to and enhance the natural and local environment by "minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks", with paragraph 32 outlining that local plans and spatial development strategies should demonstrate how opportunities for net gains have been addressed. The now mandatory national requirement for net-gain reflects the goals and policies of the UK Government's 25-Year Environment Plan, which was published in January 2018. The requirement for new development to deliver net-gain in line with national policy will likely improve connectivity throughout the parish, delivering habitat restoration and/ or habitat re-creation on site. It is also noted that further site specific impacts will be considered at the application stage should a specific scheme come forward.
- 5.11 The Tiverton Road Development Site (Policy HS04) is made up of scrub/ grassland with dense hedgerows and trees along the site boundaries. Similar criteria is set out through Policy HS04 as HS03, requiring that "existing boundary hedgerow and trees are retained, except where some loss is unavoidable to create safe vehicular access to the site". Where loss is unavoidable, Policy HS04 states that "loss must be mitigated by restoration and re-creation to provide net-gain in biodiversity." This would contribute positively towards maintaining and enhancing the local biodiversity offer; improving the area's valued green infrastructure network in line with national policy.
- 5.12 Similar policy requirements are also seen through the Roosters site allocation (Policy BJ01). Policy BJ01 seeks to facilitate the site's use as a business/employment facility as long as the development seeks to "minimise the loss of existing trees and hedges and include additional planting and other measures to ensure a net gain in biodiversity".
- 5.13 It is considered that the SPNP suitably addresses any potential effects on biodiversity, leading to **neutral effects** overall. Notably those linked to the Tiverton Road development site are anticipated to be avoided and mitigated with the potential for a net-gain in biodiversity, in accordance with Policy HS04. The wider SPNP policy framework broadly seeks to protect and enhance Silverton's local features and areas of biodiversity interest, and support the resilience of ecological networks.

Climate change

5.14 In terms of climate change mitigation, housing and employment growth proposed through the SPNP and facilitated through the Neighbourhood Plan allocations will lead to increases in the built footprint of the Neighbourhood Plan area and stimulate additional traffic flows. This will lead to some inevitable increases in greenhouse gas emissions originating from the parish. However, given the scale of growth proposed, and the likelihood of improvements to energy efficiency and the adoption of new technologies, this is not considered to lead to significant effects in relation to climate change mitigation. In addition, the allocations proposed through the SPNP are located adjacent to the existing built-up area of Silverton, with good access to local services and facilities in the village. However while it is considered that this will help limit increases in greenhouse gas emissions from transport, this may be negated by the lack of

- major local employer in the parish, with new residents likely to commute to Exeter or other local towns.
- 5.15 The SPNP therefore has a strong focus on improving traffic and promoting sustainable travel; namely through Policies TR01 TR05. Policy TR02 (Pedestrian Link to the Main Road) supports "proposals that further the creation of a safe pedestrian and cycle link between the Village and the A396", recognising the importance of increasing opportunities for people to travel locally without using a private vehicle. This is reiterated through Policy TR05 (Vehicle Sharing) which supports community car use, individual car share, and taxi-share, to reduce the number of privately owned vehicles and to free up roads in the parish.
- 5.16 Policy TR03 (Traffic Management) and Policy EN02 (Rights of Way (Public Footpaths, Bridleways and Cycleways)) also perform positively through supporting improved pedestrian links and pedestrian safety in the Neighbourhood Plan area. Additionally, Policy HS06 (Parking Spaces) and Policy TR04 (Off Road Parking) encourage the uptake of low-emission vehicles, requiring the necessary infrastructure is provided alongside new development, and encouraging Electric Car Sharing schemes.
- 5.17 Finally it is noted that Policy CS01 (Existing Community Facilities and Assets) requires that "community facilities are encouraged to have an environmental assessment undertaken to advise on how they can reduce their carbon emissions." Notably the Community Hall has installed solar panels in August of this year (2022).
- 5.18 In light of the above it is considered that the SPNP policy framework supports climate change mitigation objectives with the potential for minor positive effects once measures have been implemented. This includes through encouraging sustainable travel uptake, modal shift, and car share, to help limit greenhouse gas emissions from transport in the Neighbourhood Plan area.
- 5.19 Climate change adaptation is considered through Policy EN04 (Minimising Flood Risk). The SPNP recognises flood risk as a key issue for parts of the parish, and therefore requires through Policy EN04 that "All development proposals should show how they will incorporate Sustainable Drainage System (SuDS) principles and provision for their ongoing maintenance in order to buffer rainwater runoff and to ensure there is no adverse impact on local flood risk through development." This is underpinned by the provisions of the NPPF (2021), and further supported by the Mid Devon Local Plan. In terms of the allocations within the SPNP, all are located within Flood Zone 1, which is of low risk of flooding.
- 5.20 The issue of climate change adaptation is addressed in the SPNP through the protection and enhancement of green infrastructure. Notably, EN03 (Local Green Spaces) seeks to protect and enhance the network of green spaces present in the Neighbourhood Plan area. This is also supported through the design policies, including Policy BE01 (Local Character and Design Standards) and Policy EN01 (Retaining and Enhancing the Natural Environment). In this respect protecting and enhancing the green infrastructure network will be a key means of helping Silverton Parish adapt to the effects of climate change, leading to long-term minor positive effects. This includes through helping to

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

Historic environment

- 5.22 Silverton is one of the larger historic villages of Mid Devon dating back to the Domesday Book and before. Its Conservation Area covers a large part of the village and includes many listed buildings setting the character and charm of the old streets, central square and Church of St. Mary. As set out in the SPNP, a priority for the community is ensuring future development helps Silverton to grow sustainably, without destroying its heritage and traditions. Recognising the value of the area's rich heritage, the SPNP establishes robust standards for development proposals, underpinned by the aims and objectives of the Silverton Conservation Area Appraisal and Management Plan (2015). Specifically, Policy BE02 (Local Heritage) requires the requisite Heritage Statements accompanying planning applications to "identify the heritage assets, provide a clear assessment of the significance and impact of the proposal on those assets and to justify the design approach taken."
- 5.23 The SPNP also recognises that "any development that takes place in Silverton has the potential to have a negative or positive impact" on the parish. Policy BE01 therefore requires that "development proposals should be accompanied by a statement that sets out:
 - I. an assessment of the character of the site and its context;
 - II. how the proposed development fits in with these specific characteristics; and
 - III. how the Silverton Design Statement has been taken into account."
- 5.24 The SPNP further requires that development should have a net positive effect on the historic environment, recognising the sensitivity of assets present. Specifically, proposals are required to "be of a design that minimises visual impact through sensitive design and an appropriate level of landscaping and screening which complements and enhances the character of the local area." Furthermore, Policy BE02 states that "development proposals within or in proximity to the Silverton Conservation Area will be expected to demonstrate how they will positively conserve and enhance the unique characteristics of its location as identified in the Silverton Conservation Area Appraisal and Management Plan."
- 5.25 The quantum and distribution of growth proposed through a Neighbourhood Plan can be a key determinant of the nature of effects on a plan area's historic environment. It is important for new development not to detract from the vibrancy of historic character, though there can also potentially be opportunities

¹² Mid Devon District Council (2015) Silverton Conservation Area Appraisal and Management Plan [online] available at https://www.middevon.gov.uk/media/114951/silverton-part-1.pdf

for new development to enhance its historic character as well. The Silverton Neighbourhood Plan proposes distributing growth at small sites adjacent to the existing built area, outside of the settlement boundary. In the context of Silverton's built heritage sensitivities, as explored in Chapter 4, there is potential for new development to affect the significance of assets.

- 5.26 A detailed assessment of the Glebe Housing Development Site (Policy HS03) presented above in Chapter 4. The site is almost wholly located within the Silverton Conservation Area (approximately 70%). The proposed development site lies on the edge of the historic core of the village and provides a 'rural backdrop' with 'views and vistas obtained both in and out of the Conservation Area'. In this respect the site significantly contributes to the character and feel of the conservation area. The value of the site is further reflected through the CAA's identification of the site as an 'unlisted space of merit'. The CAA highlights that these spaces 'add interest and make a positive contribution to the character and appearance of the conservation area.'
- 5.27 While the Glebe has significant historic environment constraints, the location and layout of development, in addition to wider policy requirements, will help limit overall effects. Specifically, only the less sensitive southern part of the site is being developed for a very limited scale of development, for which the SPNP highlights that "design and layout will be critical". The SPNP is supportive of "a small-scale residential development, of up to five dwellings on a part of the site, if there is a significant and permanent community gain in terms of play and recreation space and a community woodland on the rest of the site that will be held in trust as a community asset to serve the recreation needs of the community in perpetuity." In this context, Policy HS03 sets out a series of criteria for development at The Glebe, including requiring provision for "an area of public open space of at least 0.5 ha on the Glebe".
- 5.28 In terms of reducing adverse effects on the historic environment, "development will be supported provided:
 - the scheme is sensitive to its setting within the conservation area and its close proximity to the countryside; and
 - the visual impact of the development from the Churchyard and the Berry is minimised. A Heritage Assessment would be taken into account."
- 5.29 Specifically, Map 8 of the SPNP shows that housing will be focused to the south of the site beyond the power lines, where development is less likely to be visible. Open space and community woodland will be concentrated to the north of the site, helping to limit impact on the significance of the conservation area and associated listed buildings.
- 5.30 A detailed assessment of the Tiverton Road Development Site (Policy HS03) presented above in Chapter 4. The site is located on the settlement boundary and holds a level of historic environment sensitivity, being located within 200m of three Grade II listed buildings and 70m from the conservation area. However, any impact on the significance of the conservation area is likely to be minor to negligible when consideration is given to the small size of the site (0.07ha), existing screening, and surrounding existing and forthcoming residential development. Furthermore, Policy HS04 (Tiverton Road Development Site) requires that proposals ensure that the visual appearance of the site and impact on local environment is minimised, "making use of the existing

- topography to ensure that there will be no unacceptably detrimental impact on the skyline." The protection and enhancement of the historic environment at this location is supported by the requirements of the wider SPNP framework, as discussed above.
- 5.31 In terms of the allocation of Roosters, Babylon Road Employment Site (Policy BJ01), this site is not anticipated to lead to adverse effects given it is a brownfield employment site, distant from the historic core of the village.
- 5.32 Effects of development on the local historic environment and village-scape are likely to be further managed through the implementation of Policy HS01 (Scale of Housing), which seeks to avoid large-scale development in the parish. Policy HS01 states that "Proposals for housing development of five and fewer dwellings within or on the edge of the village and on sites allocated in the Neighbourhood Plan will be supported provided they conform to the other policies of this Plan." This positively responds to local character, promoting development at an appropriate scale for the parish in accordance with the strategic context of the Local Plan.
- 5.33 Overall, it is considered that the SPNP, in accordance with the Silverton Conservation Area Appraisal and Management Plan (2015), provides a robust framework for the protection and enhancement of the local historic environment. However, the Glebe site allocation is particularly constrained in relation to the historic environment, making a significant contribution to the character and setting of the conservation area. **Minor negative effects** are therefore anticipated overall, recognising that mitigation proposed (design and layout of development, including open space/ green infrastructure provision) will help limit effects at the site level.

Landscape

- 5.34 While no part of Silverton parish is included in any national landscape designations, the parish does comprise three main landscape character areas for which management guidelines have been set out by Mid Devon District Council. 13 These strategic guidelines have informed the SPNP, notably policy EN01 (Retaining and Enhancing the Natural Beauty of our Parish) which states that "where mitigating measures are unavoidably required for development to be acceptable within its landscape setting, appropriate landscaping should be employed to mitigate the impact of the development, and such measures should include the use of native species of trees and hedges where planting is required." Further to this, Policy EN01 identifies the importance of traditional Devon hedges as valued landscape features. This reiterates the Mid Devon LCA (2011) which notes hedgerows and Devon banks as "being major contributory factors to the distinct special quality of the area and worthy of protection and/or enhancement." However, as discussed under the 'Biodiversity' SEA theme, it is considered that the policy could be improved to support habitat restoration and habitat re-creation, to reduce any residual adverse effect on overall landscape character and appearance.
- 5.35 The protection of local landscape character and appearance is further supported through Policy BE01 (Local Character and Design Standards), which

¹³ Mid Devon District Council (2011) Mid Devon Landscape Character Assessment [online] available at: https://new.middevon.gov.uk/media/103735/introduction.pdf

recognises that the design, height and scale of new properties in the parish are key influences on landscape character. In this context the policy requires that development proposals be of a design that "complements and enhances where appropriate the prevailing size, height, scale and mass, materials, layout, density and access of the existing surrounding development". Policy BE01 also places a focus on mitigation and landscape enhancement measures, supporting proposals that "minimise visual impact through sensitive design and an appropriate level of landscaping and screening which complements and enhances the character of the local area." This is reiterated through policy TR04 (Off Road Parking) which requires that provision of off-road parking "be suitably landscaped".

- 5.36 The intrinsic qualities of the local landscape are afforded a level of protection through the SPNP policies which recognise the importance of community spaces. In this context, Policies CS02 (Existing Recreation Spaces), CS03 (New Public Open Spaces), and EN03 (Local Green Space) set out the management and maintenance objectives for outdoor spaces, which will contribute positively towards maintaining the rural character of the parish. Policy EN03, notably, designates nine areas of Local Green Space because they are "local in character" and "because of [their] beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife". This provides a level of protection and support for improvement, to the local landscape, with the potential for long term positive effects.
- 5.37 In terms of the SPNP site allocations, the Glebe Housing Development Site (Policy HS03) is located adjacent to the existing settlement to the north, and is recognised through the SPNP as "currently part of the countryside that surrounds the village." There is significant community concern about the visual impact of any development on the character of this part of the village, and it is recognised that while there is a level of vegetative screening present, the site offers views to the open landscape to the south, which may be impacted by development. Additionally, development has the potential to set precedent for further development to the south, which may alter the existing character of the village, and lead to adverse effects on the wider landscape. Policy HS03 seeks to address potential adverse effects on landscape by requiring that "the scheme is sensitive to its setting" and "the development minimises the loss of existing trees and hedges and include additional planting and other measures". Further to this, an integral part of the development is the "provision for an area of public open space of at least 0.5 ha on the Glebe", which may further limit adverse effects on landscape by providing a 'buffer' to the small residential development proposed (5 dwellings).
- 5.38 The Tiverton Road Development Site (Policy HS04) is a smaller site (allocated for 2 dwellings) located on the edge of the village, surrounded by open countryside. Given its location, it is recognised through the SPNP as requiring "sensitive design and layout to ensure that its visual appearance and impact on the local environment is minimised." To this effect, development proposals "will be supported provided:
 - i. use the existing topography to ensure that there will be no unacceptably detrimental impact on the skyline;
 - ii. existing boundary hedgerow and trees are retained, except where some loss is unavoidable to create safe vehicular access to the site"

- 5.39 This will ensure that any potential landscape impacts associated with development proposals at this location are appropriately mitigated where possible.
- 5.40 The allocation of Roosters, Babylon Road Employment Site (Policy BJ01) is not anticipated to lead to adverse effects on the landscape given it is a brownfield employment site to be redeveloped for light industrial use. While the site is disconnected from the existing settlement in the open landscape, in line with Policy BJ01, proposals for redevelopment will "include adequate and appropriate screen-planting to minimise visual impact and ensure that adjoining uses are not adversely impacted by business activity on the site". This supports the regeneration of underutilised previously developed land within the parish providing that proposals can demonstrate there will be no negative impacts to the character and appearance of the surrounding countryside.
- 5.41 Effects of development on landscape character are likely to be further managed through the implementation of Policy HS01 (Scale of Housing), which seeks to avoid large-scale development in the parish. Policy HS01 states that "Proposals for housing development of five and fewer dwellings within or on the edge of the village and on sites allocated in the Neighbourhood Plan will be supported provided they conform to the other policies of this Plan." This positively responds to local character, promoting development at an appropriate scale for the parish in accordance with the strategic context of the Local Plan.
- 5.42 Overall, it is considered that the SPNP provides a robust framework for the protection and enhancement of local landscape character. Whilst the proposed allocation may have some impacts on landscape character, given the size and proposed capacity of sites (seven dwellings in total) it is envisaged that any residual effects will not be significant. Additionally, in line with the SPNP policies, incorporating landscape features into design and ensuring that development respects the existing village-scape and character of the surrounding countryside will help limit potential effects. It is therefore considered that the Neighbourhood Plan has the potential to lead to residual neutral effects on the landscape.

Land, soil and water resources

- 5.43 The Roosters, Babylon Road Employment Site allocation (Policy BJ01) will take place on previously developed land. This will promote the efficient use of land through precluding the loss of productive agricultural land and facilitating the intensification of uses at this location.
- 5.44 However, the two housing site allocations proposed through the SPNP are located on greenfield land. In terms of the quality of agricultural land, the Silverton Neighbourhood Plan Local Evidence Report (2014) indicates that the Glebe site is made up of Grade 1 (0.16ha), Grade 2 (0.03ha), and Grade 3 (0.86ha) land. While it is recognised that Grade 1 and 2 land is best and most versatile, there is no detailed information available to determine whether the Grade 3 land is Grade 3a (i.e. land classified as the best and most versatile) or Grade 3b (which is not).

¹⁴ Silverton Parish Council (2014) Silverton Neighbourhood Plan Local Evidence Report

- 5.45 In terms of the Tiverton Road Development Site, it is not possible to confirm if development will result in a loss of best and most versatile agricultural land, as recent detailed classification has not been undertaken at this location. However, based on the national 'Provisional Agricultural Land Quality' dataset, the site is located on land which is classified as Grade 2, although it is recognised that the site is very small in size at 0.07ha. It is considered that development at both sites would lead to the loss of higher quality soil resources, however given the size of Tiverton Road, effects are only likely to be significant at The Glebe.
- 5.46 It is considered that the policies which support green infrastructure enhancements and new and improved open space (including policies EN01 EN03 and policies CS02 CS03) will enhance the quality of land and water resources. This includes through promoting the ability of natural processes to support soil and water quality.
- 5.47 Water quality is further addressed indirectly through Policy HS01 (Scale of Housing Development), which seeks to limit development in the parish to "five and fewer dwellings". Avoiding large-scale growth will ensure that water quality will not be placed under further pressures by new development's impact on the sewerage network.
- 5.48 Overall however, the SPNP is predicted to have a long term significant negative effect in relation to land, soil and water resources, due to the permanent loss of best and most versatile agricultural land.

Population and community

- 5.49 The SPNP allocates three sites for development; comprising of two housing allocations and one employment site allocation. The development of these sites will deliver seven new dwellings in the parish; reflecting the local community's preference for smaller incremental development in accordance with Policy HS01 (Scale of Housing Development). This will contribute positively towards meeting the housing needs arising locally; in accordance with the conclusions of the Housing Needs Survey (2016) which "indicated a local need for smaller dwellings for singles and couples."
- 5.50 In terms of the quality of housing, the SPNP highlights that recent development in the village has largely been infill or redevelopment sites, which has raised local concerns in terms of density and design. The SPNP seeks to address this, placing focus on the high quality design and layout of new housing. This is evidenced through Policy BE01 (Local Character and Design Standards) which requires that "proposals be accompanied by a statement that sets out:
 - i. an assessment of the character of the site and its context;
 - ii. how the proposed development fits in with these specific characteristics;and
 - iii. how the Silverton Design Statement has been taken into account."
- 5.51 In terms of the delivery of a mix of housing, Policy HS02 (Meeting the Local Housing Need) requests that development proposals be cognisant of the local housing market, demonstrating how they "help maintain a relevant and balanced mix of housing types and sizes" and "reference the most recent

- Housing Needs Assessment for Silverton (2016)".¹⁵ This will lead to long term positive effects through delivering the type and size of new housing that reflects local need and contributes towards widening of choice.
- 5.52 The Housing Needs Survey (2016) identified a significant local need for affordable housing in the parish. However, the Parish Council recognise that the SPNP cannot set a requirement for a proportion of housing to be 'affordable' when only development of "five dwellings or less" is supported through the Plan (Policy HS01). The SPNP therefore seeks to address this through Policy HS05 (Community Housing) by encouraging and facilitating a community housing initiative. In this context, "Community Housing schemes such as Community Land Trust, of more than five dwellings will be supported on a site, or sites in locations within a reasonable and safe walking distance of existing community facilities, where development would not otherwise be permitted". Policy HS05 further sets out a range of criteria to be met for development to be supported, including requiring that "the land is held in trust as a community asset in perpetuity, to provide genuinely affordable housing to meet local needs". This is anticipated to lead to long term positive effects, supporting a thriving community through delivering access to homes for all.
- 5.53 Silverton village functions as a community hub for the parish, and as such the SPNP seeks to ensure it maintains an active and thriving place to live. Notably, this is addressed through Policies CS01– CS04 which proactively seek to protect and enhance the community offer, including through protecting community facilities and assets, and providing support for new public open space. This will likely deliver long term positive effects in terms of community cohesion, promoting active, engaged neighbourhoods with low levels of deprivation.
- 5.54 Limited opportunities for employment exist in the Neighbourhood Plan area; and as such the parish experiences high levels of out-commuting to Exeter or to other local towns and beyond. The results of Community Consultation (2014) indicated that "residents would like to see an increased level of job opportunities in the parish, particularly so that school leavers feel that they do not have to leave the area to find suitable employment." In response to this, the SPNP through Policy BJ01, "supports redevelopment proposals to protect existing or provide improved business/ employment space at the [Roosters] site". The redevelopment of brownfield land for industrial use at this location will contribute positively towards improving the employment offer of the parish, and supporting local economic vitality.
- 5.55 The economic growth of the parish is further supported through Policy BJ02 (Super-fast Connectivity), which "supports the development of a super-fast broadband infrastructure to serve the Silverton Neighbourhood Plan area where it is sensitively sited and sympathetically designed." Further to this, "All new residential, educational and business premises should be served by a superfast broadband (fibre-optic) connection installed on an open access basis." This provides a proactive response to the distinct growth in home working in the parish, despite the limitations of the local broadband service. The delivery of Policy BJ02 will therefore lead to long term positive effects through ensuring

¹⁵ Planning Advisory Service and AECOM (2015) Housing Needs Assessment for Neighbourhood Plans [online] available at: http://www.pas.gov.uk/documents/332612/0/PASNP/5cd2a9da-dc5e-4c5c-a982-e2f4a23d3fcc

- local business development is supported and local working opportunities remain available.
- 5.56 Overall, the SPNP is predicted to have residual **long term significant positive effects** on population and community. It is thought that the SPNP will support
 the various needs of the local community, addressing local housing needs as
 well as protecting and enhancing the community infrastructure offer. The SPNP
 will also support the growth of the local economy through capitalising on
 regeneration opportunities and encouraging local business development in the
 long term. This will positively support the overall quality of life of residents.

Health and wellbeing

- 5.57 Health and wellbeing are influenced by a wide range of factors which will vary by local context, some of which are realistically beyond the scope of the Neighbourhood Planning process. However, in terms of factors such as maintaining an attractive living environment, encouraging and enabling modal shift to cycling and walking and providing or enhancing access to recreation facilities there are a range of potential opportunities to facilitate positive effects through planning.
- 5.58 Silverton village functions as a community hub for the parish, and as such the SPNP seeks to ensure it maintains an active and thriving place to live. Notably, this is addressed through Policies CS01– CS04 which proactively seek to protect and enhance the community offer, including through protecting community facilities and assets, and providing support for new public open space. This is considered likely to result in positive effects on health and wellbeing for both existing and new residents. In the context of the proposed allocation at the Glebe (Policy HS03), it is noted that the site is allocated on the basis that "provision is made for an area of public open space of at least 0.5ha". This will likely deliver long term positive effects through improving access to open space and recreation for both new residents at the Glebe, and existing residents of the wider parish.
- 5.59 The delivery of open space at the Glebe site (Policy HS03) and through Policy CS03 (New Public Open Space) also presents opportunities to provide green linkages throughout the parish. The supporting text of CS03 also recognises that "a wider range of accessible sports and recreational facilities would support the public health agenda by providing exercise and fitness opportunities". This acknowledges more broadly the potential for green infrastructure to have positive effects in relation to health and wellbeing by promoting healthier, more active lifestyles.
- 5.60 Active lifestyles are further promoted through the SPNP policies which encourage sustainable travel. TR02 (Pedestrian Link to Main Road) positions walking and cycling provision as a priority consideration for new development, reflecting the importance the SPNP places on enabling residents have the opportunity to make journeys around the parish and the streets of the village without needing a car.
- 5.61 The PRoW and footpaths are well used by local people and provide scenic views of the local countryside. Policy TR01 (Non-Car Travel) seeks to ensure the network is further developed where possible, with footpaths, bridleways and cycleways to encourage more people to travel around locally without using

- a private motor car and many more people to take regular exercise along with the increased level of safety offered. Positive effects are therefore anticipated through allowing more people to take regular exercise and enjoy the parish in which they live, though effects are likely to be minor.
- 5.62 In light of the above it is considered that the Neighbourhood Plan is likely to have a **minor long term positive effect** in relation to the health and wellbeing SEA theme.

Transportation

- 5.63 The transportation SEA theme aims for the promotion of sustainable transport modes and minimising the need to travel where possible. In rural areas with a limited service offer and which are some distance from higher tier settlements this can be challenging, particularly where development proposed is not of a scale likely to make enhanced public transport provision viable. The SPNP sets out key objectives relating to traffic and road safety in the parish, particularly traffic speed, volume of HGV and agricultural traffic, and off-road parking.
- 5.64 To address these key issues, Policy TR03 (Traffic Management) recommends "banning of lorries over 7.5T, except for access, in built areas of the Parish to improve safety", and supports "a 20mph limit in built up areas". Policy TR03 also sets out principles against which applications for new developments will be expected to demonstrate consideration. This includes "identifying the realistic level of traffic they are likely to generate", and subsequently "assessing the potential impact of this traffic on pedestrians, cyclists, road safety, parking and congestion [...]". This is considered to represent an appropriate response to mitigating some of the localised identified transport issues within Silverton parish and ensuring that new development addresses, rather than contributes to, these issues.
- 5.65 Congestion issues are further addressed through the SPNP policies which seek to increase accessibility to, and provision of, sustainable transport. As discussed under the health and wellbeing SEA objective, policies TR01 (Non-Car Travel) and TR02 (Pedestrian Link to Main Road) require new development to consider providing new safe walking and cycling routes and extending existing routes where possible. This could help integrate new development with the village core and link to existing (albeit limited) bus services. Whilst recognising there are limits to the extent small development can affect infrastructure changes it is considered that this represents a sound principle for new development.
- 5.66 Policy TR04 (Off Road Parking) and HS06 (Parking Spaces on Housing Development) focus specifically on parking standards, requiring that development proposals consider the Devon County Council and/ or Mid Devon District Council requirements. In a village with limited capacity for on-road parking and established traffic concerns it will be important for new development to meet its own need in terms of parking need. Policy TR04 also indicates that, where criteria are met, support will be given for development proposals providing additional public car parking to serving the village, including extension of the lay-by at Ellerhayes. This further contributes towards addressing the substantial parking problem experienced throughout the village.

5.67 It is considered that the Neighbourhood Plan is likely to have a **positive effect** on the transportation SEA theme.

Conclusions

- 5.68 The assessment has highlighted that the plan as a whole is likely to lead to positive effects in relation to three SEA themes: 'Population and community'; 'Health and wellbeing' and 'Transportation'. Neutral effects are anticipated in relation to the 'Climate Change' and 'Landscape' SEA themes. Uncertain negative effects are anticipated in relation to the 'Biodiversity' theme, while negative effects are anticipated in relation to the 'Land, Soil and Water resources' and Historic Environment SEA themes.
- 5.69 The range of positive effects are anticipated in light of the SPNP's potential to deliver housing in appropriate locations to meet local needs; that new development will be required to contribute new or enhanced walking or cycling connectivity, and will likely connect positively with the village's green spaces; and that new development will be expected to avoid contributing to on-street parking and link well with the village core.
- 5.70 The plan includes a number of approaches that will contribute positively towards addressing the Climate Change SEA objective; i.e. recognising the role that retaining and enhancing green infrastructure can play in increasing resilience, particularly increased flood risk. However this is not seen to be significant in the context of the SEA process, and therefore residual neutral effects are anticipated.
- 5.71 Neutral effects are anticipated in relation to the 'Landscape' SEA theme as any impact on landscape character through the delivery of the site allocations is not likely to be significant. This is given the level of growth proposed and the location of sites adjacent to the settlement boundary. Additionally, it is considered that mitigation will be provided through sensitive design and layout.
- 5.72 Neutral effects are anticipated against the 'Biodiversity' SEA theme, recognising that potential adverse effects at the Glebe will be suitably mitigated, and wider policy provisions will broadly protect and enhance Silverton's local features and areas of biodiversity interest.
- 5.73 Minor negative effects are anticipated against the 'Historic Environment' SEA, reflecting that 70% of the site falls within the conservation area, contributing somewhat to the significance of the asset. It is recognised that mitigation proposed (design and layout of development, including open space/ green infrastructure provision) will help limit effects at the site level. Specifically, only the less sensitive southern part of the site is being developed for a very limited scale of development.
- 5.74 Significant negative effects are anticipated in relation to the 'Land, Soil and Water Resources' SEA theme, primarily in light of the fact that the allocation of the Glebe (and potentially Tiverton Road) will necessitate the loss of productive agricultural land with potential to be 'best and most versatile'.

6. Next steps

- 6.1 When the Silverton Parish Neighbourhood Plan is submitted to Mid Devon District Council (MDDC) for its consideration it will be accompanied by this Report and other relevant documents. MDDC will consider whether the plan is suitable to go forward to Independent Examination in terms of the Silverton Parish Neighbourhood Plan meeting legal requirements and its compatibility with the Local Plan.
- 6.2 The Examiner will be able to recommend that the SPNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. MDDC will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, MDDC will invite the Parish Council 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, MDDC will do so.
- 6.3 Where the Independent Examination is favourable, the Silverton Parish Neighbourhood Plan will be subject to a referendum, organised by MDDC. If more than 50% of those who vote agree with the plan, then it will be passed to MDDC with a request it is adopted. Once adopted, the Silverton Parish Neighbourhood Plan will become part of the Development Plan for Silverton Parish.

Appendix A Scoping information

Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation.

Air Quality

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

Biodiversity

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

Climate change (including flood risk)

- Flood risk in Silverton has the potential to increase as a result of development, land use change and climate change.
- Per capita greenhouse gas emissions for Mid Devon District are slightly higher than England, but have been falling since 2005.
- An increase in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions.

 There is a need to increase the Neighbourhood Plan area's resilience to the effects of climate change through supporting adaptation to the risks associated with climate change in the area.

Historic environment

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

Landscape

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

Land, soil and water resources

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

Population and community

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

• There is a high proportion of highly qualified and skilled residents with the Neighbourhood Plan area.

Health and wellbeing

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

Transportation

- The Neighbourhood Plan area does not have a railway station.
- The proportion of people driving a car or van to work is slightly higher in the Neighbourhood Plan area than Mid Devon, regional and national averages.
- Buses to and from Silverton are supplied by Stagecoach and run in a circular route from Exeter to Tiverton. Services are limited but most follow the circuit through the village stopping both at Silverton CoE Primary School and the Square. Some do not enter the village but there is are bus stops on the A396 opposite the Ruffwell and at the bottom of Upexe Lane.
- The PRoW network is an important asset for residents and is well utilised, providing a green link between lanes and roads.
- All exits from the village are constrained and road conditions are poor. Road safety is a concern in places.

Scoping consultation responses

The SEA scoping report was shared with the Environment Agency, Historic England and Natural England for formal consultation in 2022. The responses received and how they have been addressed are presented overleaf in Table A.1.

Table A.1 Consultation responses received on the SEA Scoping Report

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

Appendix B Site options assessment

This appendix presents the detailed findings of the appraisal of six individual site options within the parish, as established in Section 4.15 of the main report. These are set out in Table AB.1 below.

Table AB.1 Sites considered through the SEA process

Site	Name
A	West's Garage
В	Tiverton Road
С	Roosters
D	The Glebe
E	Hillcrest
F	Old Butterleigh Road

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

Method

Each of the site options identified in Table A.1 were considered against the SEA Framework of objectives and decision-making appraisal questions developed during SA scoping (Section 3.3) and the baseline information.

Tables AB.2 - AB.7 overleaf present this appraisal and provide an indication of each site's sustainability performance in relation to the SEA themes.

Summary findings are presented in Section 4.19 of the main report.

Table AB.1: Site A, West's Garage

Site size: 0.11 ha

Biodiversity

The site is not within or adjacent to any biodiversity designations. The site itself is previously developed; the site was in use as a garage however the business is now closed. There is little open/ green space present. However the site does hold a level of biodiversity value through the vegetation lining the site boundary. Nonetheless, development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.

Climate change

In terms of climate change mitigation, development of the site is likely to increase the built footprint of the village due to an intensification of the site. However impacts on greenhouse gas emissions are likely to be insignificant.

In terms of climate change adaptation, there are no areas of fluvial flood risk at the site though an area of surface water flood risk is located adjacent to the site, to the west. It may be necessary for future development to adopt a layout which has regard for this.

Historic

The site is 100m southwest of the Silverton Conservation Area. environment though its setting is considered to be limited by established planted screening including trees and hedgerows. As such, it is considered unlikely that development would lead to residual significant adverse effects in this respect.

> In terms of the Devon and Dartmoor Historic Environment Record (HER), 'Crosses or Warrens' is located north east of the site. 'Crosses or Warrens' includes a former farmstead, with a house and other buildings on the north side of the road, and a large barn and yard on the south side of the road, shown on mid-19th century map. This was replaced by a new farmstead called Channon's by the late 19th century.

Development of this brownfield site offers the potential to deliver enhancements to the quality of the built environment which benefits the setting of the historic environment, if high quality design and layout are incorporated within new development. Nonetheless, given the presence of the historic asset in close proximity to the site, residual effects are currently uncertain.

Landscape

There are no significant landscape constraints present at this small brownfield site, although the site does occupy a prominent position at the southwestern approach to the village and as such could be sensitive to inappropriate development in village-scape terms. However there is a high level of vegetative screening surrounding the site, notably along the roadside, limiting views in to and out of the site. Additionally, the current uses on site appears to be of low quality and offers little to the village's street scene. Therefore there could be an opportunity to enhance village-scape quality through redevelopment.

Lan	d,	soil
and	W	ater
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The site is previously developed so new development would not necessitate the loss of any agricultural land. In the context of the plan area this is a notable positive, and would represent an efficient use of soils resources through directing development away from areas of the best and most versatile land.

Population and community

Development of the site will contribute positively towards the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is located on the southern edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community.

Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.

Health and wellbeing

The site is 0.6km from the nearest health facilities (Wyndham House Surgery) in Silverton, and 0.6 km from the wider service offer in the village centre. The recreational ground on Coach Road is a similar distance from the site, offering opportunities for residents to engage in physical activities. Public footpaths from the site are notably limited, with access to the village centre via Newcourt Road, which may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.

Transport

The site is a reasonable walking distance from the village centre, along Newcourt Road, however there are no pedestrian footpaths on this road and it is narrow in places. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.

Key

Likely adverse effect (without mitigation	Likely positive effect
measures)	
Neutral/no effect	Uncertain effects

Table AB.2: Site B, Tiverton Road

Site size: 0.07 ha

Biodiversity

The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is greenfield predominately made up of scrub grassland, with sparse hedges and trees along the site boundary. Development may adversely impact these habitats and any associated species either directly through habitat loss or indirectly through disturbance.

It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.

Climate change

In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk. The site is within walking distance of the limited services offered within the village, though this would be via Tiverton Road which does not have a footpath. A continued high level of car dependence for accessing a wider range of services and facilities at nearby towns/ larger settlements is anticipated. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.

Historic

The site is not located within the Silverton Conservation Area. environment and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.

Landscape

There are no significant landscape constraints at the site, and the site is notably well-screened by mature trees on three sides. The site is located adjacent to existing development on Applemead and on the other side of Tiverton Road. While the site is elevated in part, any impact on local landscape setting is likely to be limited and it is considered unlikely that development would have a significant detrimental effect on landscape character.

Land. soil and water resources

It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 2. Development therefore has the potential to lead to a loss of best and most versatile agricultural land.

Population and community

Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is located on the north west edge of the village of Silverton and outside of the settlement area, but adjacent to existing

residential dwellings. Development would likely integrate positively with the local community.

Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.

Health and wellbeing

The site is 0.5km from the nearest health facilities (Wyndham House Surgery) in Silverton, and 0.3 km from the wider service offer in the village centre. The recreational ground on Coach Road is 0.5km from the site, offering potential for residents to engage in physical activities. Public footpaths from the site are notably limited. Access to the village centre via Tiverton Road, which may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.

Transport

The site has good vehicular access on to Tiverton road, though this is notably congested due to its direction towards the A396, a main route for travel to and from the village. The site is within good walking distance of the village centre, via Tiverton Road which may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely. The site also holds vehicle access constraints.

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Likely adverse effect (without mitigation measures)	Likely positive effect	
Neutral/no effect	Uncertain effects	

Table AB.3: Site C, Roosters

Site size: 0.25 ha

Biodiversity

The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is predominately brownfield, including Babylon farmhouse and Roosters bungalow. Hedges and mature trees are present along the site boundary, notably along Babylon Lane and adjacent to the chicken sheds. Development may adversely impact these habitats and any associated species either directly through habitat loss or indirectly through disturbance. It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.

Climate change

In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk. The site is distant from the village centre and development is likely to lead to continued high level of car dependence for accessing both local and wider services and facilities at nearby towns/ larger settlements Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.

Historic

The site is not located within the Silverton Conservation Area. environment and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.

Landscape

The site is isolated from the existing settlement, located approx. 1.6km from the built up urban area, in the open countryside. The site exists within a rural, agricultural setting, bordered on all sides by farmland. Residential development at the site therefore would not be in-keeping with the existing surrounding uses, with the potential to alter the character of the landscape. However given the site is brownfield, and small in size, effects are likely to be limited and localised. Additionally, it is noted that views in and out of the site are limited by partial vegetative screening from hedgerows and trees, and rising land to the south east side. Given the current use of the site there could be an opportunity to enhance local landscape quality through redevelopment. However, overall minor negative effects are anticipated given the nature of the site in the open countryside away from the existing settlement.

Land, soil and water resources

The site is previously developed so new development would not necessitate the loss of any agricultural land. In the context of the plan area this is a notable positive, and would represent an efficient use of resources in terms of directing development away from land classified as the best and most versatile land.

Population and community

Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is isolated from the existing settlement, located approx. 1.6km from the built up urban area. Development is unlikely to integrate positively with the local community.

Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing, and distance of the site from the existing settlement.

Health and wellbeing

The site is approx. 1.6km from local services in the village centre, including health facilities at Wyndham House Surgery and opportunities for recreation/ sport. Additionally, this route is narrow in places and may not be particularly safe for pedestrians as it does not have a footpath. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.

Transport

The site is approx. 1.6km from local services in the village centre and there are no accessible footpaths close by. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.

Key

Likely adverse effect (without mitigation measures)	Likely positive effect	
Neutral/no effect	Uncertain effects	

Table AB.4: Site D, The Glebe

Site size: 0.79 ha

Biodiversity

The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is greenfield with vegetation (hedgerows and trees) lining the site boundaries. This is notably dense along the south, coinciding with an area of Priority Habitat Inventory 'No main habitat but additional habitat exists' located adjacent to the site. Development has the potential to adversely impact these habitats and any associated species either directly through habitat loss or indirectly through disturbance. It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size.

Climate change

In terms of climate change adaptation the site is not directly affected by fluvial flood risk, though an area of surface water flood risk is located adjacent to the site, along the southern boundary. It may be necessary for future development to adopt a layout which has regard for this. The site is walking distance to the service offer within the village, supporting active travel locally. However a continued high level of car dependence is anticipated for accessing a wider range of services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.

Historic

The site is located on the edge of the historic core of the village, environment partly within the Silverton Conservation Area (the northern part of the site closest to the settlement). Archaeological mitigation may be required in order to prevent damage to the remnants of 19th century buildings which are highly concentrated in the centre of the Conservation Area. Investigation into the potential for heritage assets to be present on site may be necessary. The Conservation Area appraisal states that there are long distance/ panoramic views out of the site from Church Road and just off Newcourt Road at the north of the site. Specifically, "open swathes of farmland can be viewed to the south of Newcourt Road although some of these views are only visible through gaps in the tall hedge banks." The Conservation Area Appraisal also highlights that the church tower of St Mary the Virgin (Grade I Listed) can be seen from the entire Conservation Area (therefore including part of the site). Development at the site therefore has the potential to impact upon the setting of this significant landmark in Silverton and the surrounding countryside. Development also has the potential to impact upon the wider Conservation Area, its intrinsic qualities and setting. Notably in this respect, the Devon and Dartmoor Historic Environment Record (HER) identifies 'Orchard Banks South of Silverton' covering the site. The HER indicates that the earthwork banks fell within the area of a former orchard potentially of post medieval to 20th century date.

Landscape

The site is located at the edge of the settlement and overlooked by several residences. The site is elevated and fairly open despite broken borders of hedges and mature trees, offering rural countryside views towards the south.

Development would be a natural extension to the current built up part of the village, however would have the potential to change the existing rural character to the south, and may impact upon the local village-scape. Given the size of the site significant effects are not anticipated, with residual impact dependant on detailed design and layout.

It is noted that the land was considered by MDDC in the 2013 'call for sites' process and was withdrawn due to the environmental and high visual impact.

Land, soil and water resources

This greenfield site is currently in use for agriculture (pasture). It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 2. Development therefore has the potential to lead to a loss of best and most versatile agricultural land.

Population and community

Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The small size of the site would likely make it challenging to deliver a considerable number of affordable housing or a mix of housing types and tenures. The site is located on the southern edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community. Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.

Health and wellbeing

The site has good access to the village centre (approx. 200 meters), supporting healthy modes of travel, and providing access to open spaces for leisure, such as the recreational grounds on Coach Road. The site is also 500m from the local doctor's surgery via Newcourt and School Road. Given the rural nature of the village, a continued high level of car dependence for accessing a wider range of services and facilities at larger settlements/ towns is anticipated. However, overall, development is likely to have positive effects for the health and wellbeing of residents.

Transport

The site has good access to local services in the village centre, with paths crossing the Berry and the Churchyard to School Road; supporting active travel locally. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for access to wider services in neighbouring centres is likely.

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Likely adverse effect (without mitigation measures)	Likely positive effect
Neutral/no effect	Uncertain effects

Table AB.5: Site E, Hillcrest

Site size: 0.05 ha

Biodiversity

The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is formerly surplus garden land to the rear of three bungalows, which has more recently been cultivated for private allotment space. Allotments are an increasingly important biodiversity resource, often providing excellent habitats for wildlife. 16 Development of the site is therefore likely to lead to negative effects, adversely impacting habitats and associated species through permanent loss or disturbance.

Climate change

In terms of climate change adaptation the site is not directly affected by fluvial or surface water flood risk. The site is within walking distance to the services offered within the village, supporting active travel locally. However a continued high level of car dependence is anticipated for accessing a wider range of services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant.

Historic

The site is not located within the Silverton Conservation Area. environment and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.

Landscape

This village site is small in size, previously in use as surplus garden land to the rear of several bungalows, now turned allotment space. As such, residential development would likely be seen as infill, in keeping with the existing built form. However, development will likely impacts on village-scape character as it will lead to the loss of open land in the middle of the village.

Land, soil and water resources

This greenfield site is previously garden and currently in use as allotment space. It is not possible to confirm if an allocation at this site will lead to a loss of best and most versatile agricultural land as recent land classification has not been carried out in this location. According to pre-1988 agricultural land classification this land is classified as Grade 3, which may be Grade 3a (which is best and most versatile) or 3b (which is not). It is therefore uncertain at this stage whether development would lead to a loss of best and most versatile agricultural land.

Given the existing land use is allotment space, development on the site will inevitably lead to the loss of productive land, with the potential for adverse effects. However, the significance of any impact would likely be negligible given the size of the site and subsequent very limited loss of land.

¹⁶ Natural England (2007) Wildlife on allotments [online] available at: https://enablelc.org/wpcontent/uploads/2016/03/wildlifeonallotments.pdf

Population and community

Development of the site will contribute positively towards the meeting local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it extremely challenging to deliver affordable housing or a mix of housing types and tenures. The site is located to the north east of the village of Silverton and adjacent to existing residential dwellings. Development would likely integrate positively with the local community.

Overall, the contribution towards meeting local housing need is considered positive despite the limited opportunity for delivering affordable housing.

Health and wellbeing

The site has good access to the village centre (approx. 500m), supporting healthy modes of travel, and providing access to open spaces for leisure, such as the recreational grounds on Coach Road. The site itself is currently a single allotment, which provides a place for exercise, and opportunities for socialising; supporting community engagement and the overall wellbeing of residents. Residential development at the site would therefore lead to negative effects against this SEA theme due to the loss of this community resource.

In terms of access to health services, the site is 500m from the local doctor's surgery via Wyndham Road. Given the rural nature of the village, a continued high level of car dependence for accessing a wider range of services and facilities at towns/ larger settlements is anticipated.

Overall, development is likely to lead to negative effects given the loss of the allotment space.

Transport

The site has good access to local services in the village centre, supporting active travel locally, and there are public footpaths extending along the site boundary connecting with local services such as the C of E Primary School.

The site is within 100m of a local bus stop, however services are notably limited. A continued reliance on the car for access to wider services in neighbouring centres is likely.

A key constraint for this site is access. The site has no secure vehicular access given a recently built house (11a) controls access from the public highway and a further plot of land, owned by a third party, intervenes. With the co-operation of the adjoining owners, access could be achieved to enable development, however this is uncertain at this stage.

Key

Likely adverse effect (without mitigation measures)

Likely positive effect

Meutral/no effect

Uncertain effects

Table AB.6: Site F, Old Butterleigh Road

Site size: 0.41 ha

Biodiversity

The site is not within or adjacent to any biodiversity designations. In terms of biodiversity value present at the site itself, the site is greenfield predominately made up of scrub grassland, with hedges and trees along the site edges and lining the site boundary. An ecology survey has been carried out by Ecological Surveys Ltd which found evidence of dormice along the eastern boundary. Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Development at the site therefore has the potential to adversely impact habitats present and associated species, including protected species, either directly through habitat loss or indirectly through disturbance.

It is however noted that development of the site could present an opportunity for enhancement through redevelopment. This could potentially include opportunities for biodiversity net gain, although it is acknowledged the site is limited in size. Overall given the presence of protected species at the site. negative effects are anticipated at this stage.

Climate change

In terms of climate change adaptation, there is a small area of Flood Zone 2 and 3 located along the eastern boundary of the site, coinciding with a small watercourse. This area of the site is also at risk of surface water flooding. It is likely that future development will be required to adopt a layout which has regard for this, avoiding the high flood risk area. The site is walking distance to the limited service offer within the village, supporting active travel locally. However, a continued high level of car dependence is anticipated for accessing a wider range of services and facilities at nearby towns/ larger settlements. Development will increase the built footprint of the area, however impacts on greenhouse gas emissions are likely to be insignificant..

Historic

The eastern boundary of the site abuts the Silverton environment Conservation Area, with the potential for development to lead to adverse effects on its setting. However the Conservation Area Management Plan does not identify the site as holding any notable views or features, and no listed buildings or other historic environment designations are present in the setting of the site. The Devon and Dartmoor Historic Environment Record (HER) does not list any features within, or in close proximity to, the site.

Landscape

The greenfield site borders the main village settlement to the south, located between existing residential dwellings stretching along Old Butterleigh Road. Development at the site would therefore be in keeping with the existing ribbon development seen, providing a natural extension to the existing built form up the valley. Additionally, the site is bounded by hedge-banks and trees and has minimal sightlines into the area, reducing the potential for any adverse effects on landscape character/ setting.

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Agricultural Land Classification carried out for the site indicates that almost half the site is Grade 2 and half is Grade 3 agricultural land. While it is uncertain whether this is Grade 3a (which is best and most versatile) or Grade 3b (which is not), given the presence of Grade 2 land, development would likely result in the loss of high quality agricultural land.

Population and community

Development of the site will contribute positively towards meeting the local housing needs of the area, however, it is noted that this is not expected to be significant given its capacity. The very small size of the site would likely make it challenging to deliver affordable housing or a mix of housing types and tenures. The site is located on the northern edge of the village of Silverton and outside of the settlement area, but adjacent to existing residential dwellings. Development would likely integrate positively with the local community.

Overall, the contribution to housing need is considered positive despite the limited opportunity for delivering affordable housing.

Health and wellbeing

Due to its position on the edge of the settlement along Old Butterleigh Road, the site has good access to key community services in the north/ centre of the village such as the doctor's surgery (0.5km from the site). This supports healthy modes of travel, providing access to open spaces for leisure, such as the recreational grounds on Coach Road.

Given the rural nature of the village, a continued high level of car dependence for accessing a wider range of services and facilities at nearby towns/ larger settlements is anticipated. However, overall, development is likely to have positive effects for the health and wellbeing of residents.

Transport

The site is well located in terms of access to services in the village centre, supporting active travel locally, however there are no public footpaths from the site. Access to the village centre would be via Old Butterleigh Road, High Street and Fore Street. Notably Old Butterleigh Road is narrow in places and may not be particularly safe for pedestrians. The site is distant from the bus stop in the village centre, and services are notably limited. A continued reliance on the car for travel is likely.

Key

Likely adverse effect (without mitigation measures)

Likely positive effect

Meutral/no effect

Uncertain effects

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