

Strategic Environmental Assessment (SEA) for the Harberton Neighbourhood Plan

SEA Technical Note

Harberton Parish Council

February 2025

Quality information

Prepared by	Checked by	Verified by	Approved by
E.B: Environmental Planner	R.P: Principal Environmental Planner	N.C.B: Technical Director	N.C.B: Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1.0	13.02.25	Draft version	13.02.25	N.C.B.	Technical Director
V2.0	14.02.25	Final version	14.02.25	C.R.	Parish Clerk

Prepared for:
Harberton Parish Council

Prepared by:
AECOM Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

aecom.com

© 2025 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) in accordance with its contract with Locality (the “Client”) and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

1. Introduction	1
Background	1
Local Plan context for the HPNP	1
Purpose of this Technical Note	2
 2. Summary of SEA work to date	 3
Introduction	3
Defining reasonable alternatives	3
Options for the distribution of growth in the neighbourhood area	3
 3. Consultation on site options.....	 6
Identification and assessment of sites.....	6
Community engagement	7
 4. Next steps for the SEA and plan making	 8
Consideration of additional reasonable alternatives	8
Establishing the preferred approach.....	8
Updating the SEA Environmental Report	9

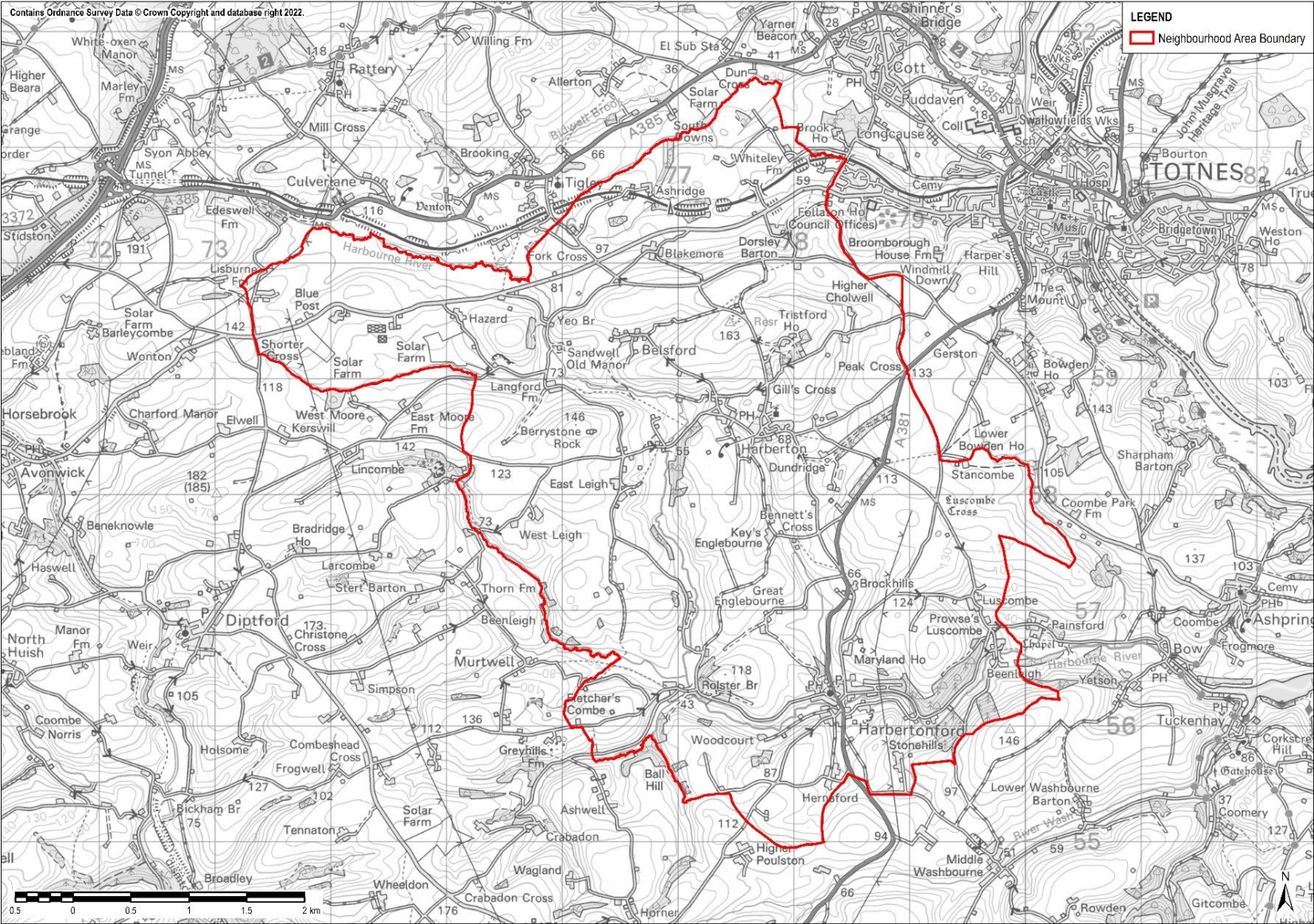


Figure 1.1: Harberton neighbourhood area

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Harberton Parish Neighbourhood Plan (HPNP).
- 1.2 The HPNP is being prepared under the Localism Act 2011¹ and the Neighbourhood Planning (General) Regulations 2012², and in the context of the Plymouth and South West Devon Joint Local Plan 2014-2034³.
- 1.3 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and the potential alternatives in terms of key environmental issues. The aim of SEA is to inform the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the HPNP seeks to maximise the emerging plan's contribution to sustainable development.

Local Plan context for the HPNP

- 1.4 The Plymouth and South West Devon Joint Local Plan (JLP) 2014-2034 was adopted in 2019 and forms part of the development plan for the administrative areas of Plymouth, South Hams, and West Devon. Within the 'Thriving Towns and Villages' chapter, the JLP identifies the two key settlements within the neighbourhood area – Harberton and Harbertonford - as sustainable villages which have a *"limited but vital provision of services and amenities"*.
- 1.5 The JLP supports growth in these sustainable villages to meet local needs and encourages communities to identify sites to meet these needs (particularly through the preparation of neighbourhood plans) through Policy TTV25 'Development in the Sustainable Villages'. Specifically, the JLP provides a housing target of 30 homes for Harbertonford and 20 homes for Harberton, totalling 50 homes across the neighbourhood area (see Figure 5.8 in the JLP).
- 1.6 Neighbourhood plans will form part of the development plan for Plymouth and the South West Devon area, but not as a replacement for the JLP. Neighbourhood plans are required to be in general conformity with the Local Plan context and can develop policies and proposals to address place-based issues. In this way it is intended for the Local Plan context to provide a clear overall strategic direction for development in Plymouth and South West Devon, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

¹ UK Government (2011): [Localism Act 2011](#)

² UK Government (2012): [The Neighbourhood Planning \(General\) Regulations 2012](#)

³ Plymouth Council (2019): [Plymouth and South West Devon Joint Local Plan 2014-2034](#)

Purpose of this Technical Note

1.7 This Technical Note is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (March 2023), which included information about the neighbourhood area's environment and community and set out the proposed approach to the SEA process. The second document was the Interim Environmental Report (November 2024) which appraised the relative sustainability merits of options for the distribution of growth in the neighbourhood area.

1.8 The purpose of this Technical Note is to:

- Provide a summary of the options that have been developed and assessed as 'reasonable alternatives' for the purposes of the SEA (**Chapter 2**).
- Provide a summary of the site assessment work which has been completed for the available site options in the neighbourhood area (**Chapter 3**).
- Provide an overview of the community consultation exercise completed in Summer 2024 on possible site options which are being considered for a potential residential allocation in the Neighbourhood Plan (**Chapter 3**).
- Consider the next steps for the SEA and plan making over the coming months, prior to Regulation 14 consultation (**Chapter 4**).

2. Summary of SEA work to date

Introduction

- 2.1 The ‘narrative’ of plan-making / SEA up to this point is told within this part of the Technical Note. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the emerging HPNP.

Defining reasonable alternatives

- 2.2 As discussed in **Chapter 1**, the JLP categorises Harberton and Harbertonford as sustainable villages. The JLP provides a housing target of 30 homes for Harbertonford and 20 homes for Harberton, totalling 50 homes across the neighbourhood area.

- 2.3 The following information is discussed below:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives.

Options for the distribution of growth in the neighbourhood area

- 2.4 The neighbourhood area has a number of constraints and challenges to delivering additional growth. For example, growth is likely to increase the number of private vehicles on the local road network, reflecting a lack of active and sustainable transportation opportunities. This is likely to contribute to traffic and congestion issues in the neighbourhood area, due to the narrow nature of the road network within and around Harberton and Harbertonford. It could also increase the use of the A381 in Harberton, which has the potential to impact upon road and pedestrian safety within the settlement.
- 2.5 Growth in the neighbourhood area also has the potential to impact upon biodiversity and geodiversity. This includes the landscape connectivity zone associated with the South Hams Special Area of Conservation (SAC). Focusing growth within or adjacent to settlement boundaries in the neighbourhood area also has the potential to reduce landscape impacts (for example, changes to views), given the neighbourhood area sits within the setting of the Dartmoor National Park (located to the north) and the South Devon National Landscape (located to the east and west).
- 2.6 From a heritage perspective, growth within or adjacent to the settlement boundaries could have an impact on the historic environment, given both Harberton and Harbertonford have associated conservation areas. With no appraisals or management plans in place, residential development could impact upon the setting and significance of heritage features (both designated and non-designated).
- 2.7 The neighbourhood area is also at risk of fluvial and surface water flooding, largely linked to the presence and drainage pattern of the River Harbourne and

surrounding topography. Following a significant flooding event⁴ in 2023, there are worries around how further development will exacerbate flood risk in Harberton and Harbertonford.

2.8 Taking into consideration the significant constraints present within the neighbourhood area; the SEA has considered the following options with respect to the distribution of growth:

- **Option A:** Align with the JLP requirements to deliver the housing target (i.e., 30 homes in Harbertonford village and 20 homes in Harberton village).
- **Option B:** Facilitate higher growth in Harberton village in comparison to Harbertonford village.
- **Option C:** Facilitate higher growth in Harbertonford village in comparison to Harberton village.

2.9 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal was presented as a commentary of effects for the eight SEA themes which have been scoped into the assessment, as follows:

- Air quality.
- Biodiversity and geodiversity.
- Climate change and flood risk.
- Community wellbeing.
- Historic environment.
- Land, soil and water resources.
- Landscape.
- Transportation.

2.10 To support the appraisal findings, the options have been ranked in terms of their performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the sustainability merits of the three options in relation to each theme considered.

2.11 The detailed appraisal findings are presented in the Interim Environmental Report (November 2024). A summary of the appraisal findings (including the rankings of the options and the identification of likely significant environmental effects) is presented in **Table 2.1** below.

⁴ BBC (2023): [Community pulls together after floods hit homes](#)

Table 2.1: Summary of assessment findings

SEA theme		Option A	Option B	Option C
Air quality	Rank	1	3	2
Air quality	Significant effect?	No	No	No
Biodiversity and geodiversity	Rank	2	1	3
Biodiversity and geodiversity	Significant effect?	Uncertain	Neutral	Yes - negative
Climate change	Rank	2	1	3
Climate change	Significant effect?	Yes - negative	Yes - negative	Yes - negative
Community wellbeing	Rank	2	3	1
Community wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
Historic environment	Rank	1	3	2
Historic environment	Significant effect?	Yes - negative	Yes - negative	Yes - negative
Land, soil and water resources	Rank	1	3	2
Land, soil and water resources	Significant effect?	Uncertain	Uncertain	Uncertain
Landscape	Rank	1	2	2
Landscape	Significant effect?	Uncertain	Uncertain	Uncertain
Transportation	Rank	2	3	1
Transportation	Significant effect?	Yes - negative	Yes - negative	Yes - negative

3. Consultation on site options

Identification and assessment of sites

- 3.1 With a view to meeting the housing targets for the sustainable villages within the neighbourhood area, the Parish Council were keen to consider where growth could be delivered. In light of this, the Parish Council undertook a Call for Sites process between July and September 2022. Together with the South Hams District Council's latest Strategic Housing Land Availability Assessment (SHLAA)⁵, the Parish Council identified a number of sites that could contribute to the housing target for the neighbourhood area. A total of 19 sites were identified, including:
- Nine sites towards the northern boundary of the neighbourhood area, primarily covering larger areas of greenfield land immediately to the west of Totnes.
 - Five sites within proximity to Harberton village, primarily covering areas of greenfield land adjacent to the northern and eastern village boundaries⁶.
 - Five sites within proximity to Harbertonford village, including four greenfield sites adjoining the northern, southern, and western village boundaries, and one smaller brownfield site within the village.
- 3.2 Subsequently, an independent and objective site options and assessment (SOA) process was completed between March and October 2023. The SOA assessed sites to establish which are suitable, available and likely to be viable for development taking into consideration the policies of the JLP and national policy. Sites were given the following suitability ratings:
- **Red:** the site is unsuitable for a housing allocation due to the presence of significant constraints to development at this location.
 - **Amber:** the site is potentially suitable for a housing allocation but has some minor constraints which would require appropriate mitigation.
 - **Green:** the site is suitable for a housing allocation and does not contain any significant constraints to development.
- 3.3 Detailed assessment findings are presented in the SOA Report⁷. A summary of the results is provided below:
- All of the nine sites located towards the northern boundary of the neighbourhood area were given a 'red' rating. This is due to their location at a significant distance from Harberton village and Harbertonford village. In this respect, allocations at these locations would be contrary to JLP policies.
 - Three of the five sites within proximity to Harberton village were given a 'red' rating. With reference to the other two sites within proximity to Harberton village:

⁵ South Hams District Council (2017): [SHELAA Site Information Packs - South Hams](#)

⁶ The Community Land Trust (CLT) site within Harberton village was not included in the assessment, as this site currently has planning permission.

⁷ AECOM (2023): [Harberton Parish Neighbourhood Plan Site Options and Assessment 2023](#)

- **Land East of Harberton** (Site SH_23_17_16) was given a 'green' rating. The assessment identifies limited constraints to development as the site does not overlap with any environmental or heritage designations. However, key design considerations would need to focus on ensuring that landscape, topography and access, and ecological networks are reflected in the design of any new development areas. An indicative housing capacity of between 9 and 17 homes has been identified, and there is developer interest at this location.
 - **Land at Preston Farm** (Site NP6) was given an 'amber' rating. The assessment identifies that the southern area of the site may be suitable for some limited housing development. Heritage, landscape, and flood risk constraints for this site would need to be appropriately addressed and mitigated through the design of any new development areas at this site. Access is also a concern and is potentially dependent on 'Land East of Harberton' also being brought forward. An indicative housing capacity of between 37 and 56 homes has been identified (across the whole site area). Significantly fewer homes is perhaps more realistic if focusing growth in the southern area of the site.
- 3.3.1 Four of the five sites within Harbertonford village were given a 'red' rating. Key constraints include access and highways issues, the steepness / sloping aspect of the sites, and potential flood risk concerns. Within the village itself, Old Road (Site NP1) was given an 'amber' rating and is potentially suitable for 'infill' development (up to 2 homes). However, there is no potential to create vehicle access to the site, and heritage constraints are a concern given its location within the conservation area and the setting of a listed building.

Community engagement

- 3.4 As discussed above, the SOA concluded that one site would be suitable to include as a residential allocation in the Neighbourhood Plan and a further two sites would be potentially suitable, subject to the mitigation of identified constraints. These sites are:
- SH_23_17_16: Land East of Harberton (suitable)
 - NP6: Land Part of Preston Farm (potentially suitable)
 - NP1: Old Road, Harbertonford (potentially suitable)
- 3.5 A public exhibition and consultation events on new housing in the Parish took place in July 2024. Responses to the consultation are currently being reviewed by the Neighbourhood Plan Steering Group with a view to informing the preferred approach for the emerging HPNP. Further details on the consultation process are available on the Neighbourhood Plan website⁸.

⁸ Harberton Parish Council (2024): [Housing Consultation](#)

4. Next steps for the SEA and plan making

Consideration of additional reasonable alternatives

- 4.1 The SEA Team (with support from the Neighbourhood Group) will develop a set of reasonable alternative 'options' for informing the preferred approach for the Neighbourhood Plan. The alternatives will be discussed and agreed during a collaborative workshop (delivered virtually) in Spring 2025.
- 4.2 It is expected that the alternatives will focus on options for housing growth (growth 'scenarios') for the neighbourhood area. Specifically, considering different combinations of sites which could be included as an allocation within the Neighbourhood Plan. The assessment will present the constraints and opportunities associated with the options, highlighting the relative sustainability merits against the SEA themes which have been scoped-in to the assessment.
- 4.3 Reflecting the findings of the SEA work completed to date, alongside the findings of the community consultation and site assessment work, it is anticipated that the additional reasonable alternatives assessment will focus on combinations of site options within Harberton village. However, the additional assessment may also include 'Winsland House', towards the northern boundary of the neighbourhood area, which is being promoted by a developer.
- 4.4 Engagement with the Local Planning Authority has indicated that site options within the northern section of the neighbourhood area, if allocated within the Neighbourhood Plan, would not contribute towards local housing needs. However, the Neighbourhood Group are reluctant to proceed with any allocation(s) in Harberton village until the position with 'Winslade House' is more established. With respect to the SEA, the decision on whether to incorporate 'Winsland House' in to the additional assessment will be informed by the updated site assessment work which is ongoing at present. Specifically, the findings within the SOA Report are being reviewed to determine whether the conclusions on suitability are clear, accurate, and objective.

Establishing the preferred approach

- 4.5 The Neighbourhood Plan enables the community to influence where development comes forward, pro-actively planning to meet housing needs. Without allocating sites, speculative applications may come forward in less-sustainable locations in the neighbourhood area during the plan period.
- 4.6 The findings of the SEA, alongside community engagement and the wider evidence base for the HPNP, will inform the development of the preferred approach for the HPNP over the coming months. Further engagement with landowners and the local community may take place, and the pre-submission ('draft') plan will be finalised and consulted upon ('Regulation 14' consultation).
- 4.7 The SEA puts forward the following recommendations for plan makers tasked with preparing the draft plan:

- Encourage development to consider the impact upon the South Hams SAC and important bat populations, strengthening ecological networks and delivering net gains for nature.
- Ensure growth is focused on sites outside of flood zones, given the high risk of fluvial and surface water flooding within the neighbourhood area.
- Encourage proposals to consider how active and sustainable transportation uptake can be increased through development. For example, this could include the creation of new routes, or links to the existing networks, to improve access to active and sustainable transportation opportunities.
- Encourage proposals to be accompanied by a proportionate heritage assessment to consider the heritage sensitivities of assets and areas, along with opportunities to retain and enhance their setting and significance through the design of new development areas.
- Ensure proposals implement a landscaping scheme which is sensitive to their location and enhances landscape and villagescape character.

Updating the SEA Environmental Report

4.8 Once the preferred approach has been agreed, the pre-submission ('draft') plan will be prepared and consulted upon ('Regulation 14' consultation).

4.9 The Interim Environmental Report (November 2024) will be updated and published alongside the emerging HPNP at Regulation 14 consultation. The updated Environmental Report will include three key sections:

- **Summary of SEA scoping:** presenting the responses received from the statutory consultees and how the responses have been considered through the SEA.
- **Consideration of reasonable alternatives:** incorporating the options assessment for the distribution of growth (as discussed in **Chapter 2**) and the findings of the additional assessment of growth scenarios (as discussed in **Chapter 3**).
- **Appraisal of the draft plan:** discussion of the relative sustainability merits of the policies and proposals presented in the draft plan, with additional recommendations put forward to plan makers where appropriate.

