

Strategic Environmental Assessment (SEA) for the Harberton Parish Neighbourhood Plan

SEA Environmental Report accompanying the Regulation 14 consultation
on the Neighbourhood Plan

Harberton Parish Council

February 2026

Quality information

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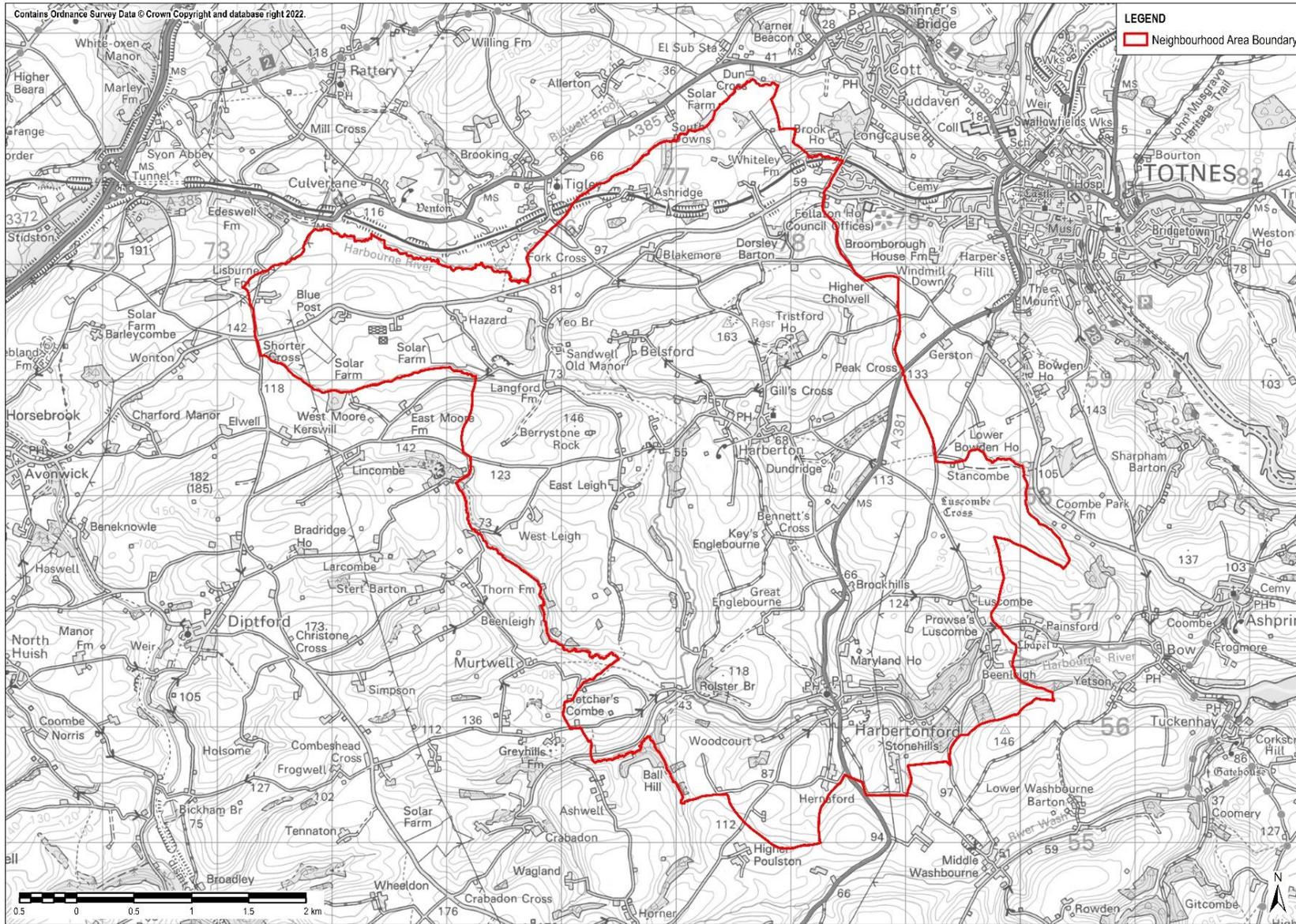
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Figure 1.1: Harberton Parish neighbourhood area

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 (hereafter referred to as “the 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.

SEA screening for the Neighbourhood Plan

- 1.3 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are likely to be screened in as requiring an SEA if both the following apply:
 1. the Neighbourhood Plan is being prepared within an area with significant environmental constraints, such as, for example, Sites of Special Scientific Interest (SSSI) and designated heritage assets; and
 2. the Neighbourhood Plan is likely to allocate sites for development.⁴
- 1.4 An SEA process is being undertaken for the HPNP to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).⁵

SEA explained

- 1.5 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA seeks to maximise the emerging plan’s contribution to sustainable development.
- 1.6 Two key procedural requirements of the SEA Regulations are that:
 - i. When deciding on ‘*the scope and level of detail of the information*’ which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues.
 - ii. An ‘Environmental Report’ is published for consultation alongside the draft plan (i.e., the draft HPNP) that presents outcomes from the environmental assessment (i.e., discusses ‘likely significant effects’ that would result from plan implementation) and reasonable alternatives.
- 1.7 This ‘Environmental Report’ is concerned with item ‘ii’ above.

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](#)

⁴ DLUHC (February 2022): Chief Planner’s Newsletter, February 2022 ‘Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening’ accessible [here](#).

⁵ UK Government (2004) ‘The Environmental Assessment of Plans and Programmes Regulations 2004’ can be accessed [here](#).

Structure of this Environmental Report

1.8 This document is the SEA Environmental Report for the HPNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Table 1.1: Questions that Must be Answered by the SEA Environmental Report to Meet the Regulatory⁶ Requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁷
What's the scope of the SEA? What is the plan seeking to achieve?	An outline of the contents and main objectives of the plan.
What's the scope of the SEA? What is the sustainability 'context'?	Relationship with other relevant plans and programmes. The relevant environmental protection objectives , established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA? What is the sustainability 'baseline'?	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA? What are the key issues and objectives?	Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives . Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	The likely significant effects associated with the Regulation 14 version of the plan . The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan .
What happens next?	The next steps for the plan making / SEA process.

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

⁷ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Purpose of this Environmental Report

1.9 This Environmental Report 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 Scoping Report was released for consultation with the statutory consultees for SEA (the Environment Agency, Historic England, and Natural England), for a period of five weeks between March and April 2023.

1.10 The purpose of this Environmental Report is to:

- Provide an outline of the options that have been developed as 'reasonable alternatives' for the purposes of the SEA.
- Appraise the relative sustainability merits and the likely significant environment effects of the options.
- Provide a sustainability context for different approaches that can be taken for the HPNP; and
- Inform the development of the preferred approach for the HPNP.

Local Plan context for the HPNP

1.11 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"*.

1.12 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).

1.13 This is reiterated in the Plymouth and South West Devon Joint Local Plan Five Year Review Report 2024, which seeks to ensure that the JLP and its policies remain effective and works to discern whether the plan may need updating. The [Five-Year Review Report](#) (March, 2024) demonstrates that the JLP continues to provide an effective strategy for the management of growth and development across the whole plan area. The JLP therefore remains sound and will continue to be used in full for the purpose of decision making.

1.14 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.

2. What is the scope of the SEA?

Summary of SEA Scoping

- 2.1 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’*.
- 2.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.⁸ These authorities were consulted on the scope of the SEA between March and April 2023.
- 2.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the HPNP.
 - Baseline data against which the HPNP can be assessed.
 - The key sustainability issues for the HPNP; and
 - An ‘SEA Framework’ of objectives against which the HPNP can be assessed.
- 2.4 The full SEA Scoping Report is available on the Neighbourhood Plan website and accompanies the evidence base for the HPNP.⁹
- 2.5 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

Table 2.1: Consultation responses received on the SEA Scoping Report

Consultation Response	How the Response was Considered and Addressed
Historic England <i>response received on 4th April 2023</i>	
The scope and approach to the SEA seems rigorous and likely to form a solid foundation as a heritage evidence-base for the various site allocations proposed within the plan. We particularly welcome the draft heritage asset map.	Comment noted.
We note that the draft Neighbourhood Plan does not make a number of specific site allocations for housing. Given this, we would usually expect to see a heritage-based justification that explored the potential risk of harm to heritage assets at each named site. It would be normal to have a brief assessment, at each named site: a narrative and recommendations as to how any proposed development might avoid or mitigate potential harm.	Comment noted. The HPNP is no longer allocating sites, with the rationale provided in Chapter 3 in this Environmental Report. However, the HPNP has a strong focus on ensuring that development design respects and safeguards the heritage significance and sensitivities within the neighbourhood area. This is further discussed in Chapter 4 of the Environmental Report.

⁸ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.

⁹ Including the context review and baseline data for the neighbourhood area, for each SEA theme.

Consultation Response

How the Response was Considered and Addressed

The proposed site allocations are all directly adjacent to the three main built-up areas of Harberton, Harbertonford and Follaton. Therefore, we suggest that the SEA particularly seeks to address the potential of impact to heritage assets (and their settings) on and adjacent to these site allocations.

As per the comment above, the HPNP is no longer allocating sites.

We have no specific comments to make at this point in time. However, we look forward to having the opportunity to comment further at the Regulation 14 consultation stage.

Comment noted. Responses to the policies and proposals within the HPNP (and SEA findings) are welcomed.

Natural England

Response received on 4th April 2023

Natural England generally agrees with the scope and level of detail to be included in the Environmental Report, and has the following comments to make...

Comment noted.

Baseline information

Please see attached annex for our advice on sources of evidence on the natural environment.

The annex has been a useful source of reference during the SEA process.

South Hams SAC – Greater Horseshoe Bats

The Neighbourhood plan area is within the Landscape Connectivity Zone of the South Hams SAC. Greater Horseshoe bats are a designated feature of the South Hams SAC, which is not clear from the SEA Scoping Report.

In October 2019, The South Hams SAC Steering Group published the '[South Hams Special Area of Conservation \(SAC\) - Greater Horseshoe Bats - Habitats Regulations Assessment Guidance](#)'. This should be referenced in the SEA, and it will also obviously impact the HRA Appropriate Assessment, if this is thought to be required.

The South Hams SAC – Greater Horseshoe Bats HRA Guidance should be present in the Policy Context Review.

Comment noted. The policy framework within the draft HPNP recognises the sensitivities of the SAC and incorporates mitigation measures to address potential effects from new development.

The HRA Guidance has been a useful source of reference during the preparation of the HPNP.

The effects of HPNP policies and proposals to 'biodiversity and geodiversity' are discussed in further detail within Chapter 3 and Chapter 4 of this Environmental Report.

Biodiversity – SEA Objectives

It seems that the first bullet point in point 3.16 is confused by referencing both minimising impacts and biodiversity net gains. It implies that biodiversity (and geodiversity) net gains are optional/possible. We advise that the wording in the first bullet point be amended from 'and provide net gains where possible' to 'following the mitigation hierarchy'. Point 5, which references biodiversity net gains, should be moved to follow this, to become bullet point 2.

Comment noted. The SEA Framework has been updated accordingly.

Consultation Response	How the Response was Considered and Addressed
We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.	Comment noted.
Environment Agency	No response received

2.6 The key sustainability issues and SEA Framework are presented below.

Key Sustainability Issues

Air quality

- The HPNP neighbourhood area is within proximity to the Totnes AQMA, which could be negatively impacted as a result of future development. Therefore, it will be important that the HPNP addresses how future development will mitigate any negative effects.
- The main pollutant of concern is NO₂, which is largely linked to emissions from vehicles.
- The HPNP presents opportunities to improve accessibility and support public transport and active travel.

Biodiversity and geodiversity

- Internationally designated sites within proximity to the neighbourhood area includes the South Hams SAC. The neighbourhood area sits within the Landscape Connectivity Zone associated with the South Hams SAC.
- There are several BAP Priority Habitat types within the neighbourhood area, including good quality semi-improved grassland, lowland meadows, deciduous woodland and traditional orchards.
- There is ancient woodland within the neighbourhood area – the Leigh Bridge copse, which is considered important for its wildlife and soils.
- There are areas of Network Enhancement Zones 1 and 2 and Network Expansion Zone that indicate areas most suitable for habitat re-creation, new habitats and green infrastructure and habitat linking.

Climate change (including flood risk)

- South Hams District Council has declared a climate change and biodiversity emergency, resolving to support local authorities (and, by extension, neighbourhood groups) to help tackle climate change through plan-making where possible. Harberton Parish Council have also declared a climate emergency.
- The transport sector continues to be a key challenge in terms of reducing emissions. The HPNP provides opportunities to guide development towards the most accessible locations in the neighbourhood area and require local infrastructure (including walking and cycling infrastructure) improvements where appropriate.

- Opportunities to influence per capita emissions could be sought through the HPNP process, particularly by planning for integrated and connected development, which reduces the need to travel and supports opportunities to travel by more sustainable modes. The HPNP can also influence design features of individual developments so as to minimise emissions involved both in the construction and ongoing operation.
- The neighbourhood area is at risk of varying levels of surface water flooding, and a small proportion of the total area is within Flood Zone 2 and Flood Zone 3. Surface water run-off from development can exacerbate the risk of flooding by increasing the run-off from land to watercourses. Surface water flooding also impacts the local road network in the neighbourhood area. It is noted that the River Harbourne (at Harbertonford) flooded around January / February 2023 for the first time since the new flood scheme was implemented – and there is concern over how new development will impact flood risk in the area. There was also a significant [flooding event](#) which affected both villages in September 2023.
- Opportunities to enhance the resilience of both the neighbourhood area and its residents to the effects of climate change should be sought. This can include adaptation strategies, green infrastructure enhancement, flood betterment measures, infrastructure development, and increased renewable energy sources.

Community wellbeing

- The services, facilities and amenities within the neighbourhood area contribute to the community vitality and quality of life of the existing residents. However, these are limited and result in residents travelling out of the neighbourhood area. As such, development in the neighbourhood area will need to consider how it could cause place pressure on external services.
- As the requirements of the working population continue to change, there is likely to be a need for adaptable dwellings which can accommodate more flexible working practices.
- Based on IMD data, the South Hams 006B LSOA is within the 20% most deprived neighbourhoods for 'Barriers to Housing and Services' and within the 10% most deprived neighbourhoods for 'Living Environment'.

Historic environment

- There are a variety of designated heritage assets within and surrounding the neighbourhood area, including listed buildings, scheduled monuments, conservation areas and a registered park and garden. Development of the HPNP provides an opportunity to deliver a spatial strategy that avoids or minimises impacts for the historic environment.
- The HPNP provides an opportunity to develop the existing evidence base in relation to the historic environment. This is especially true for the Harberton and Harbertonford conservation areas, both of which do not have an appraisal or management plan associated with them. It also poses an opportunity to further heritage understanding in the neighbourhood area through exploring the heritage assets in the area.

- It will be important to ensure that future development avoids/ minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure, to the indirect benefit of heritage settings.

Land, soil and water resources

- The provisional ALC data indicates that the neighbourhood area is underlain by areas of Grade 3 and Grade 4 agricultural land. However, the data does not differentiate between Grade 3a and Grade 3b land. As a finite resource, Grade 3a (BMV land) should be protected where possible. The neighbourhood area has a low likelihood of being underlain by BMV land.
- The neighbourhood area overlaps with a MSA for aggregates in the north. Consultation with Devon Stone Federation may be required.
- The Harbourne River and the Bidwell Brook waterbodies, and their associated tributaries, run through the neighbourhood area. Development should avoid impacts to water quality for both these waterbodies.
- Plan-making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.

Landscape

- Whilst the neighbourhood area does not sit within a nationally designated landscape, it is located in close proximity to the Dartmoor National Park and the South Devon National Landscape (previously Area of Outstanding Natural Beauty, or AONB). As such, it is likely the neighbourhood area contributes to the setting of these nationally important landscapes through its character and quality.
- The relationship between the settlements and the open countryside is an important part of the character and special qualities of the neighbourhood area.
- New development has the potential to lead to incremental change in landscape and villagescape character and visual amenity.

Transportation

- Sustainable transport opportunities in the neighbourhood area are limited. The nearest train station in the neighbourhood area is Totnes Railway Station, which offers links to a variety of locations around the UK, but it is 2km from the neighbourhood area and would require residents to travel to the station by private vehicle. There is a limited bus service in the neighbourhood area and as such development is likely to lead to an increase in private vehicle usage.
- There are public footpaths in the neighbourhood area that could facilitate safe and active sustainable transportation opportunities.
- The continued uptake of more flexible working practices has the potential to lead to changing travel patterns, most notably resulting from increased levels of working from home.

SEA Framework

2.7 The SEA framework provides a way in which environmental effects can be defined and subsequently analysed based on standard ‘tests’. Each proposal within the current version (i.e., the Regulation 14 version) of the HPNP will be assessed consistently using the framework.

Table 3.2: SEA framework of objectives and assessment questions

SEA theme	SEA objective	Supporting SEA assessment questions (will the option / proposal...)
Air quality	Support objectives to improve air quality within and surrounding the neighbourhood area and minimise sources of nitrogen dioxide.	<ul style="list-style-type: none"> • Improve air quality in the Totnes AQMA that is in proximity to the neighbourhood area? • Implement measures (such as green infrastructure) which will help to support good air quality in the neighbourhood area? • Promote and encourage more sustainable transport options, including the provision of electric vehicle charging points? • Encourage development which reduces the need to travel?
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Avoid or, if not possible, minimise impacts on biodiversity and geodiversity, including internationally and nationally designated sites, and following the mitigation hierarchy? • Achieve biodiversity net gains and support the delivery of ecosystem services and multifunctional green infrastructure services? • Support the integrity of the designated sites for biodiversity and geodiversity located within proximity to the neighbourhood area? • Protect and enhance priority habitats, semi-natural habitats, species, and the ecological network connecting them? • Support the national habitat network, particularly Network Enhancement Zones and identified restorable habitat? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support and promote access to and interpretation and understanding of biodiversity and geodiversity?
Climate change (including flood risk)	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and EV infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria (including, but not limited to, Passiv House insulation levels, solar panels on roofs, and low carbon heating energy)? • Generate energy from low or zero carbon sources (including, but not limited to, wind turbines, solar panels and biomass), or reduce energy consumption from non-renewable resources?

SEA theme	SEA objective	Supporting SEA assessment questions (will the option / proposal...)
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, reducing deprivation, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Ensure that inappropriate development does not take place in areas at higher risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water run-off, reducing runoff where possible? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? <hr/> <ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing residents?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Conserve and enhance buildings, structures, and areas of architectural or historic interest, both designated and non-designated, and their settings? • Support access to and the interpretation and understanding of the historic environment? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Protect the integrity and the historic setting of key finds of cultural heritage interest as listed in the Devon and Dartmoor HER?
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	<ul style="list-style-type: none"> • Promote the use of previously developed land, including the regeneration of underutilised brownfield land? • Support the minimisation, reuse, and recycling of waste? • Avoid any negative impacts on water quality and support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside proposed development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and / or water recycling?

SEA theme	SEA objective	Supporting SEA assessment questions (will the option / proposal...)
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and villagescape.	<ul style="list-style-type: none"> • Protect and enhance the local landscape and villagescape character, key sensitivities and features, and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Protect visual amenity and locally important views in the neighbourhood area? • Support the integrity of the landscape in the neighbourhood area in accordance with the Devon Landscape Character Assessment? • Protect and enhance the landscape in line with the Dartmoor National Park and South Devon National Landscape management plans?
Transportation	Promote sustainable transport use and active travel opportunities and reduce the need to travel.	<ul style="list-style-type: none"> • Support the objectives within the Devon and Torbay Local Transport Plan to encourage the use of more sustainable transport modes? • Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements, including electric vehicle charging points? • Improve local connectivity and pedestrian and cyclist movement? • Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area? • Reduce the impact of the transport sector on climate change? • Improve road safety? • Reduce the impact on residents from the road network? • Encourage the measurement of progress of transport schemes linked to new development (for example, traffic calming measures)?

3. Consideration of reasonable alternatives through the SEA

Introduction

3.1 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the emerging HPNP. The following information is included in accordance with the SEA Regulations:

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

Defining reasonable alternatives

3.2 Whilst work on the emerging HPNP has been underway for some time, the aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.

3.3 Specifically, there is a need to explore the strategic factors that have a bearing on the establishment of reasonable alternative approaches (i.e., in relation to the level and distribution of growth) and the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the HPNP). These factors are then drawn together to arrive at reasonable alternatives.

Top-down considerations (e.g., strategic factors)

3.4 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.

Bottom-up considerations (e.g., site availability)

3.5 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)¹⁰, 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:

¹⁰ South Hams District Council (2017): [SHELAA Site Information Packs - South Hams](#)

- 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 boundaries¹¹.
- 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.

3.6 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.

3.7 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. Further engagement with the Local Planning Authority has indicated that site options within the northern section of the neighbourhood area, if allocated within the HPNP, would not contribute towards local housing needs.

3.8 Three of the five sites within proximity to Harberton village were given a 'red' rating. With reference to the other two sites in proximity to Harberton village:

- **Land East of Harberton** (Site SH_23_17_16) was originally given a 'green' rating but was subsequently given an 'amber' rating in the 2025 updates to the SOA (later discussed). 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

¹¹ The Community Land Trust (CLT) site within Harberton village was not included in the assessment, as this site had planning permission at the time when the assessments were undertaken.

between 37 and 56 homes has been identified (across the whole site area). Fewer homes is perhaps more realistic if focusing growth in the southern area of the site.

- 3.9 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.
- 3.10 A public exhibition and consultation events on new housing in the Parish took place in July 2024. Responses to the consultation were 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 website¹².
- 3.11 Detailed assessment findings are presented in the SOA Report¹³ which accompanies the HPNP at Regulation 14 consultation. The initial report (prepared in October 2023) was updated in April 2025 in light of the responses received from the consultation events and the reappraisal of 'Winsland House' (towards the northern boundary of the neighbourhood area, adjoining Totnes) which is being promoted by a developer. The updated SOA Report concludes:
- "While a large number of sites have been identified in the neighbourhood area, the majority of these are either in remote locations which are unsuitable for allocation due to conflict with national planning policy, or sites which would form an extension to Totnes and would be incompatible with the Local Plan strategy of directing development to the most sustainable locations and reinforcing and protecting existing settlement patterns.*
- "The limited number of sites on the edge of Harberton or Harbertonford are mostly unsuitable for development due to site specific constraints such as access, landscape impacts or flood risk, and the remaining sites that have been identified as 'potentially suitable' have significant constraints where development may be possible if constraints are resolved or mitigated but are marginal in terms of suitability."*

Options for the focus of growth in the neighbourhood area

- 3.12 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.
- 3.13 Growth in the neighbourhood area also has the potential to impact upon biodiversity and geodiversity. This includes the landscape connectivity zone

¹² Harberton Parish Council (2024): [Housing Consultation](#)

¹³ AECOM (2025): [Revised Site Assessment Report \(April, 2025\)](#)

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).

3.14 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 assets.

3.15 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 event¹⁴ in 2023, there are worries around how further development will exacerbate flood risk in Harberton and Harbertonford.

3.16 Taking into consideration the significant constraints present within the neighbourhood area, the SOA consultations and the findings from the community's housing consultations, the SEA has considered the following options with respect to the focus 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.

3.17 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been 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.
- Community wellbeing.
- Historic environment.
- Land, soil and water resources.
- Landscape.
- Transportation.

¹⁴ BBC (2023): [Community pulls together after floods hit homes](#)

3.18 The appraisal considers the relative sustainability merits of the three growth distribution options, shown in **Table 3.1** and **Table 3.2**. Findings are presented as a commentary on effects. To support the appraisal findings, the site 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 relative performance of the three options in relation to each theme.

Table 3.1: Summary of assessment findings

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

Table 3.2: Commentary on the growth distribution options

SEA Theme	Commentary
Air quality	<p>Negative effects are concluded under all three options at this stage. In terms of ranking the options, facilitating growth in line with the JLP through Option A is concluded to be the most favourable. This is due to bringing forward distributed growth across the settlements of Harberton and Harbertonford, which could reduce the potential to exacerbate existing air quality concerns in both settlements.</p> <p>Option C is ranked the second most favourably. Higher growth within Harbertonford could increase air quality concerns amongst residents of both the settlement and the neighbourhood area. This is linked to the A381, which passes through the settlement centre. This is due to increased growth being likely to contribute additional vehicles and associated air pollutants to the local road network.</p> <p>Harbertonford is connected to main gas supplies. Comparatively, the village of Harberton largely relies on coal and wood burning, and tanked fuel, given it is not connected to mains gas infrastructure. This likely impacts on current air quality in the village, especially at peak times. As such, increased development in this settlement through Option B has the potential to exacerbate air quality conditions in Harberton and is subsequently ranked the least favourably.</p> <p>Given that the existing air quality baseline in the neighbourhood area is favourable, with no air quality management area designations. No significant effects are anticipated through any of the options.</p>
Biodiversity and geodiversity	<p>Neutral effects are concluded at this stage under Option B, uncertain effects are concluded for Option A, and negative effects are considered likely under Option C. In terms of rankings, Option B is ranked the highest, as concentrating more growth within Harberton will avoid greater levels of development coming forward within the more biodiversity sensitive Harbertonford. This will reduce the potential for negative impacts to the landscape connectivity zone associated with the South Hams Special Area of Conservation (SAC), which overlaps with the Harbertonford settlement. As such, development through Option B will also reduce the potential to impact upon important Greater Horseshoe Bat populations. Following this is Option A, as this growth strategy seeks to bring forward lower growth in Harbertonford when compared to Option C, and in line with the Plymouth and South West Devon JLP. Finally, Option C is ranked the least favourable given it seeks to bring forward a greater level of development in Harbertonford, which is more sensitive in terms of biodiversity.</p>

SEA Theme Commentary

Climate change Significant negative effects are considered at this stage under all options, reflecting the high flood risk in the neighbourhood area. In terms of climate change adaptation, Harberton village has a medium to high risk of fluvial flooding, and a low to medium risk of surface water flooding. Comparatively, the settlement of Harbertonford is at medium to high risk of fluvial and surface water flooding. However, in terms of climate change mitigation, Harberton has limited opportunities to engage with sustainable transportation, whereas sustainable transportation in Harbertonford is more viable given there are more bus services that stop in the village. As such, growth in line with the Plymouth and South West Devon JLP through Option A is concluded to be the more favourable option, followed by Option B. Option C is the least favourable option given its elevated flood risk.

Community wellbeing Positive effects are considered at this stage for all three options, given they deliver housing to meet the identified need of the local community. When considering the rankings of the options, Option C is more favourable. This is due to facilitating higher growth in Harbertonford, which has a greater community infrastructure provision than Harberton. As such, focusing a greater level of growth here will allow for better access to existing services and facilities. Following Option C is Option A, as it facilitates more dispersed growth across both settlements in line with the Plymouth and South West Devon JLP. Finally, Option B is ranked third, given it would facilitate greater growth in Harberton – which has less community infrastructure provision.

Historic environment Negative effects are noted under all three options at this time. This reflects the historic sensitivity of both settlements – which includes conservation areas and listed buildings at both locations, and a scheduled monument within Harberton. As such, development through any of the options has the potential to impact upon the historic environment in the absence of mitigation measures and sensitive design.

In terms of rankings, Option A is ranked the highest as it delivers growth spread across both settlements. This could limit the potential for more concentrated development through Option B and Option C to negatively impact upon the historic environment of the two settlements. Option C is ranked the second most favourably; whilst Harbertonford has an associated conservation area and numerous Grade II listed buildings, concentrating growth in this location would reduce development in Harberton. Given Harberton has a greater number of heritage assets, Option B is ranked the least favourably.

Land, soil and water resources Uncertainty is concluded most likely for all three options at this time, due to uncertainty around exactly where growth will be placed within the settlements of Harberton and Harbertonford, and how this will impact upon natural resources. In terms of

SEA Theme Commentary

ranking the options, all three would bring forward development on land of lower agricultural quality (provisionally Grade 3 or Grade 4), though it is noted that Harberton village is adjacent to an area of land with a high likelihood of being best and most versatile land to the east. As such, concentrated growth through Option B could result in the loss of productive agricultural land if development were to come forward on the eastern settlement boundary. Furthermore, both settlements are within the Harbourne River water body catchment – with the watercourse passing to the west of Harberton and through the centre of Harbertonford.

Option A is ranked the most favourably due to dispersed growth across both settlements, in line with the capacities outlined in the Plymouth and South West Devon JLP strategy. Following this, Option C is ranked the second most favourably, due to focusing development in an area with a lower potential of being underlain by productive agricultural soils. Option B is found to be the least favourable.

Landscape	Uncertain effects are considered for landscape under all three options. None of the options would impact a nationally designated landscape. Option A is ranked most favourably given it disperses growth across the two settlements, thus reducing the potential for negative impacts to occur to landscape and villagescape character through concentrated growth in either Harberton or Harbertonford. Option B and Option C are ranked equally, given both settlements have similar landscape features and characteristics, and as such higher growth in either settlement will likely have similar impacts to landscape and villagescape character.
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Transportation	Negative effects are likely for all three options, given growth will increase the number of vehicles on the road and exacerbate existing concern around traffic volume and speed on the local road network, including on the A381. It also reflects the relative lack of safe active transportation provision in the two settlements, due to reduced pavement provision – though it is noted the A381 in Harbertonford does have an adjacent pavement from the petrol station to the junction with Moreleigh Road.
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In terms of ranking the options, Option C is ranked highest. This is due to greater sustainable transportation opportunities being present within the settlement – three different bus services travel to Harbertonford, as opposed to one in Harberton. Following this is Option A, as bringing forward growth in line with the Plymouth and South West Devon JLP is unlikely to cause significant stress on the local transport network. Option B is ranked the least favourably, given that it has a low sustainable transport provision and no pavements to facilitate safe pedestrian movements.

Establishing the preferred approach

3.19 The preferred approach for the HPNP has been informed by the SOA findings, SEA findings, and the wider evidence base (including feedback received from community consultation events). In light of this, the HPNP does not allocate any specific sites, but instead is supportive of development proposals coming forward in suitable locations subject to the stipulations within the policy framework. In particular, residents have expressed strong support for small-scale, well-designed housing that meets the needs of local people - particularly young families, older residents wishing to downsize and those working locally.

3.20 Additionally, the HPNP establishes detailed design guidance and placemaking principles to help shape any new development areas which might come forward during the plan period. The HPNP has a strong focus on design in this respect and has also been informed by various evidence studies including:

- A [Design Guidance and Codes](#) document prepared for the neighbourhood area (October, 2023).
- A Devon and Biodiversity Records Centre [Report](#) (June, 2024) detailing the ecological sensitivities within the neighbourhood area; and
- [Housing Consultation events](#) (undertaken in 2024 and 2025).

3.21 The Regulation 14 version of the HPNP states:

“Public Consultation took place in October 2025 specifically regarding whether or not to allocate Meadow Close/Ford Farm in view of the fact that the Consultants had reclassified Ford Farm to “Amber” from “Green” i.e. potentially suitable if constraints were resolved.

“Responses from 86 parishioners were received following exhibitions, meetings (virtual and in person) and a questionnaire. This showed that 77.9% were opposed to allocating Meadow Close/Ford Farm. The outcome of this process is that no land within the JLP definition of “sustainable villages” has been identified as suitable for development.

“Only 2 sites, (both in Harberton,) were identified as “potentially” suitable for allocation. Ford Farm (Meadow Close) and Preston Farm Field were both rated ‘amber’. Preston Farm was not accepted for allocation by parishioners in the 2024 public consultation and Ford Farm was not accepted in the 2025 Public Consultation and, therefore, they have not been allocated within this NP.

“A site that was put forward for allocation, (Winsland House Farm,) was deemed as inadmissible despite being within the Parish. AECOM considered that part of the site was potentially suitable for development but acknowledged that it was in conflict with the JLP requirement of being within or adjacent to a “sustainable village”. Despite this, during many of the public consultations, significant support for Winsland House Farm to be allocated in the Neighbourhood Plan was voiced and has continued to be voiced. Advice has been sought and whilst this land has not been formally allocated in this Neighbourhood Plan it is clear that there is still considerable support in the Parish for this site.”

4. Appraising the Regulation 14 version of the HPNP

Introduction

4.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the HPNP. This chapter presents:

- An appraisal of the current version (i.e., the Regulation 14 version) of the HPNP under the eight SEA theme headings; and
- The overall conclusions at this current stage.

What is the HPNP trying to achieve?

4.2 The vision for the HPNP captures the community's views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated. Specifically, by 2034...

“Harberton Parish will remain a thriving, welcoming, and sustainable rural community that values its heritage, protects its beautiful environment, and supports the well-being of everyone who lives and works here. We will embrace change that meets local needs, strengthens community life, and respects the character of our villages and countryside.

“Harberton and Harbertonford will continue to evolve as distinct but connected settlements, each retaining its own identity while sharing in a common purpose: to ensure a vibrant future rooted in the qualities that make this Parish special.”

HPNP policies

4.3 To support the implementation of the vision statement, the Regulation 14 version of the Harberton Parish Neighbourhood Plan puts forward 39 policies to guide new development within the neighbourhood area. The policy reference numbers and names are listed in **Table 4.1** below.

Table 4.1: Policies within the Regulation 14 version of the HPNP

Policy Reference	Policy Name
Housing	
HP1	Location and Scale of Housing Development
HP2	Affordable and Local-Needs Housing
HP3	Housing Density, Mix, Type
HP4	Design and Character
HP5	Sustainable and Low-Carbon Homes

Policy Reference	Policy Name
HP6	Rural Exception and Community-Led Housing
Flood mitigation	
FL1	Development and Flood Risk
FL2	Sustainable Drainage Systems (SuDS)
FL3	Natural Flood Management
FL4	Resilience and Adaptation
Environment	
E1	Protecting the Landscape
E2	Locally Important Views
E3	Protecting Wildlife and Increasing Biodiversity
E4	Public Access to Nature
E5	Local, Sustainable Food Production
E6	Light Pollution
Energy Provision and Carbon Emissions	
ENP1	Energy Efficiency in New Development
ENP2	Renewable and Low-Carbon Energy Generation
ENP3	Community Energy
ENP4	Retrofitting and Existing Buildings
Business and Economy	
BE1	Supporting Local Employment and Enterprise
BE2	Home-Based and Remote Working
BE3	Rural and Agricultural Diversification
BE4	Reuse of Redundant Buildings
BE5	Digital Connectivity
BE6	Sustainable Tourism and Local Services

Policy Reference Policy Name

Social Amenity and Heritage

SA1	Impact of new Development
SA2	Local Green Spaces
SA3	Social Cohesion Projects
HE1	Conservation and Enhancement of Heritage Assets
HE2	Design and Local Distinctiveness
HE3	Reuse of Historic Buildings
HE4	Setting and Views
HE5	Recording and Interpretation

Transport and Communications

T1	Sustainable Transport and Development
T2	A381 Crossings and Pavements
T3	Electric Vehicle Infrastructure
T4	Parking
T5	Speed Reduction on the A381

Methodology

- 4.4 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 2.2**) as a methodological framework.
- 4.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 4.6 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. 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.

Appraisal findings

Air quality

- 4.7 The Harberton Parish Neighbourhood Plan has a focus on improving air quality and minimising sources of air pollution (including nitrogen dioxide), largely through prioritising sustainable growth, and encouraging a shift towards sustainable and active travel uptake. Whilst the plan does not allocate specific sites for housing development, Policy HP1 works to ensure future growth is within or adjoins existing development in the neighbourhood area. This is likely to help enhance air quality by lowering air pollution linked to transportation; there would be a reduced need to rely on private vehicles to access important infrastructure, given it would be in proximity.
- 4.8 Furthermore, the plan’s transport policies demonstrate a focus on reducing air pollution. Policy T1 outlines support for residential and commercial development where proposals include electric vehicle charging points (reiterated through Policy T3 and Policy HP5), which is anticipated to help facilitate the transition to low-emission vehicles. Additionally, the policy seeks to support and provide additional active and sustainable transport infrastructure. This coupled with the design elements proposed in Policy T2, which focus on improving pedestrian and cycling infrastructure, is anticipated to encourage walking and cycling, which will help to reduce emissions linked to transport and promote air quality enhancements. It is further noted that Policy BE2 supports the development of digital infrastructure and co-working hubs to facilitate home working, which directly contributes to better air quality by reducing the need for daily travel.
- 4.9 The natural design elements and green infrastructure policies of the plan also play a vital role in maintaining and enhancing air quality. For example, Policy HP4 and Policy E1 emphasise the need for high-quality landscaping and the creation and integration of green infrastructure (including wildlife corridors, community orchards, and large-scale tree planting) in new development. Measures such as these are anticipated to contribute towards air quality by increasing natural air purification in the neighbourhood area linked to increased levels of photosynthesis. This is further emphasised by policies such as Policy SA2 and Policy HE2, which seek to retain local green spaces, and traditional hedgerows and boundary features.

Biodiversity and geodiversity

- 4.10 The Harberton Parish Neighbourhood Plan works well to contribute towards maintaining and enhancing biodiversity and geodiversity. This is demonstrated through its focus on integrating ecological preservation and enhancement into development design. Though the plan does not allocate specific sites for housing growth, it does seek to establish an approach to development where biodiversity is appropriately considered. This includes through ensuring that development retains and enhances ecological networks and semi-natural habitats, as demonstrated by Policy E3 – which seeks to resist proposals that are harmful to designated or non-designated biodiversity sites. Policy E3 also

seeks to support proposals that provide land for wildlife and biodiversity – which illustrates the importance of biodiversity to the local community and neighbourhood area.

- 4.11 The plan's design-led approach to biodiversity and geodiversity is also demonstrated through its focus on nature-based infrastructure and landscape features. For example, Policy E1 and Policy HP4 propose the integration of high-quality landscaping, wildlife corridors, and large-scale tree planting. This is anticipated to contribute towards maintaining and enhancing biodiversity through creating additional natural habitats within the built environment, which also contributes to maintaining and enhancing biodiversity connectivity. Furthermore, Policy HE2 emphasises the protection of the neighbourhood area's boundary features – including traditional Devon banks and hedgerows, which are also likely to contribute towards biodiversity connectivity in the neighbourhood area. Additionally, Policy E6 seeks to protect nocturnal biodiversity by requiring development to include lighting strategies to reduce light spill. This is anticipated to contribute towards maintaining Greater horseshoe bat populations that are associated with the South Hams SAC, for which the Harberton Parish neighbourhood area falls within the associated Landscape Connectivity Zone.
- 4.12 Nature-based solutions are also likely to achieve secondary benefits for biodiversity and geodiversity. For example, Policy FL2 is concerned with reducing flood risk and effects by incorporating sustainable drainage measures into development. This focus on nature-based solutions means that infrastructure such as swales, ponds and green roofs will also contribute towards biodiversity in the neighbourhood area. This is further reinforced by Policy FL3, which outlines a preference for natural flood management to be integrated into development design, such as wetland restoration and woodland creation. These policies are considered to contribute positively to biodiversity and geodiversity by creating additional habitat areas to support species within the neighbourhood area.
- 4.13 It is further recognised that the safeguarding of green spaces under Policy SA2 is also anticipated to maintain and enhance biodiversity connectivity and quality – especially given that a number of these spaces are valued for their biodiversity value.

Climate change

- 4.14 The Harberton Parish Neighbourhood Plan also works to mitigate and adapt to the effects of climate change. This is largely achieved through design stipulations focused on promoting low-carbon development and nature-based strategies, to reduce carbon and greenhouse gas emissions and manage flood risk and effects.
- 4.15 It is recognised that the plan does not allocate sites for development, and as such is unlikely to be directly responsible for additional carbon and greenhouse gas emissions being released in the neighbourhood area linked to new housing growth. Instead, the plan has a focus reducing carbon and greenhouse gas emissions by prioritising energy efficiency and sustainable transport. For example, Policy HP5 and Policy ENP1 seek to support development where they will achieve high energy efficiency standards, including (but not limited to) by incorporating renewable energy infrastructure, providing electric vehicle

charging points, and incorporating passive design measures into design. This is likely to reduce carbon and greenhouse gas emissions associated with an increase in activity in the neighbourhood area. The transition to clean energy is further supported by Policy ENP2 and Policy ENP3, which encourage renewable and low carbon energy generation to help reduce local reliance on fossil fuels.

- 4.16 To further reduce transport related emissions, Policy T1 indicates that all new residential and commercial developments will only be supported where they include electric vehicle charging points. Electric vehicle charging infrastructure is further encouraged through Policy T3. Additionally, Policy BE2 supports proposals that enable home working or the creation of small-scale shared workspaces within the neighbourhood area, to help reduce the need for commuting. These policies are anticipated to contribute towards lowering emissions linked to the transportation sector (the largest contributing sector to emissions in Devon in 2018) by encouraging a reduction in the use of private combustion engine vehicles. It is also noted that by supporting development within and adjoining existing built-up areas through Policy HP1, the plan encourages an uptake in sustainable and active transportation methods, as residents will be located within proximity to existing services and are unlikely to rely on private vehicles as heavily.
- 4.17 It is further recognised that policies seeking to maintain and enhance natural features in the neighbourhood area, such as Policy SA2, Policy E1, and Policy E3, are also anticipated to provide mitigating effects in relation to climate change. This is through maintained and enhanced levels of carbon capture and storage, linked to retained and increased photosynthesis.
- 4.18 In relation to climate change adaptation, the plan has a focus on increasing resilience to flooding and extreme weather events. This includes through Policy HP1, which seeks to ensure that new housing development will not increase the possibility of localised flooding and conforms to the Environment Agency's and government regulations and guidance on development in floodplains. Additionally, the plan has a focus on incorporating nature-based solutions and restricting development to lower risk areas, as stipulated by Policy FL1 - which seeks to support development in areas with low or minimal risk of flooding.
- 4.19 It is recognised that the plan does not allocate sites for development, and as such is not anticipated to have any direct impacts on flood risk and effects in comparison to the baseline. However, the inclusion of Policy FL2 further demonstrates a focus on reducing flood effects in the neighbourhood area – by supporting development proposals where they integrate sustainable drainage systems to manage surface water runoff. This includes design elements that mimic natural processes like green roofs, swales and rain gardens.
- 4.20 The focus on managing flood risk and effects with a natural approach is further exemplified through Policy FL3 and Policy E1, which support the inclusion of natural flood management in development proposals. Measures such as woodland creation, hedgerow planting, soil management, and scrub creation, are anticipated to act as natural flood defences through increased water interception. Furthermore, Policy FL4 seeks to support initiatives that improve the resilience of existing properties and infrastructure to flood risk and effects. This is considered likely to bring forward positive effects, as measures such as

property level flood protection measures will help lower the impacts of flooding on the existing community.

Community wellbeing

- 4.21 The Harberton Parish Neighbourhood Plan does not allocate sites for development, and as such does not directly meet the local identified housing need for the neighbourhood area. However, it does have a strong focus on design stipulations, which will ensure that potential growth is directly aligned with the needs of the existing and future community.
- 4.22 The policy framework of the plan includes housing policies that prioritise social inclusivity and accessibility. This includes ensuring future development is within or adjoins the existing built-up areas of Harberton and Harbertonford through Policy HP1, and ensuring that affordable and local housing needs are met through Policy HP2, Policy HP3, and Policy HP6. Additionally, Policy HP4 seeks to ensure that new homes are built to meet the standards of Building for a Healthy Life. These measures are anticipated to contribute to community wellbeing by encouraging additional homes to meet the local identified need; helping to keep the community diverse in relation to demographics (e.g., affordable housing for younger people, smaller homes for older residents wishing to downsize). Additionally, these measures are likely to encourage community integration between new and existing residents, and support healthy and active lifestyles. A diverse population and a sense of community cohesion and togetherness is likely to contribute towards positive mental health and wellbeing, and the integration of infrastructure to encourage healthy lifestyles will likely contribute to physical and mental health and wellbeing.
- 4.23 The HPNP also has a great focus on protecting existing community services and facilities, and green infrastructure. This is anticipated to safeguard existing opportunities for social connection and engagement with physical activity, both of which contribute to enhanced community wellbeing by promoting healthy lifestyles and community cohesion and interaction. This is demonstrated by Policy SA2 (and the detailed designations associated with this policy in Appendix 4 of the plan), which seeks to safeguard ten local green spaces, such as the Harbertonford allotments and the Harberton playing fields, that are valued by the community for their contribution to recreation in the neighbourhood area. These spaces are designed to act as meeting places – promoting social interaction between residents and reducing feelings of isolation and providing safe spaces to engage with physical activity.
- 4.24 Furthermore, the HPNP seeks to retain important community facilities through Policy SA1 - only permitting development that leads to loss or harm where the proposal will replace facilities with new ones of equal or greater quality or value or can demonstrate the facilities are no longer needed. This policy is anticipated to work well towards retaining existing community infrastructure that contributes to the daily health and wellbeing needs of residents, such as the community-owned shop and local educational facilities. Additionally, Policy SA3 outlines the Parish Council's intention to apply for grants to support youth and age-related community facilities, or to support community network projects. Again, this is considered a positive effect, as it shows a proactive approach to encouraging community cohesion in the neighbourhood area.

- 4.25 The health of the neighbourhood area's community is considered through policies such as Policy E4 and transport policies T1 and T2, which emphasise the importance of physical activity for health and wellbeing by seeking the creation of active travel opportunities. This includes providing safe pedestrian footways and cycling routes – which is anticipated to improve accessibility to key services and facilities in the neighbourhood area as well as encourage an uptake in active transport.
- 4.26 Economic and digital resilience are also key contributors to community wellbeing. By supporting home working and the creation of co-working hubs through Policy BE2, the plan seeks to reduce the need for commuting to access employment opportunities. This could contribute to community wellbeing by helping to improve work-life balances and reducing travel-related stress. This is supported by Policy BE5, which indicates development proposals to improve broadband and mobile coverage will be supported, and new housing or commercial development proposals should demonstrate how they will provide high quality digital infrastructure to meet the needs of modern businesses and home working.

Historic environment

- 4.27 The Harberton Parish Neighbourhood Plan works to protect, conserve and enhance the historic environment of the neighbourhood area, achieved through embedding heritage preservation into the design stipulations of the plan. Although the plan does not allocate specific sites for housing development, the housing policies contribute towards maintaining and enhancing the historic environment in the neighbourhood area. This is achieved through Policy HP1, which focuses growth towards areas that are already developed and reducing the likelihood of growth coming forward in more heritage-sensitive parts of the neighbourhood area. Additionally, development will need to demonstrate it will not adversely affect the heritage and character of the neighbourhood area through Policy HP1; this further contributes to the historic environment by ensuring growth is sensitively designed to avoid adverse effects to heritage settings and significance. Policy HP4 includes design stipulations that relate directly to the historic environment, including the need for development to reflect the distinctive character and materials used in the existing built environment, and avoiding interruptions to existing sight lines to historic buildings. This focus on ensuring high quality design is anticipated to reduce the potential the adverse effects on the historic environment through housing development; rather, it could work to enhance historic settings, which could further contribute to enhancing historic significance of specific assets, areas and features, and the wider historic environment across the neighbourhood area.
- 4.28 The plan includes heritage specific policies to further protect and enhance the historic environment in the neighbourhood area. Policy HE1 and Policy HE2 work well to establish an approach for potential future growth that ensures it respects the designated and non-designated heritage assets, areas and features in the neighbourhood area, as well as their wider settings and significance. This is achieved through measures such as ensuring development proposals seek to conserve and enhance heritage, demonstrate an understanding of historical significance, respect existing settlement form, and use materials that reflects the existing built environment. This will help to

ensure the historical significance of specific heritage assets, areas and features are retained, and historical character in the neighbourhood area is maintained.

- 4.29 Additionally, Policy HE3 seeks to reuse historic buildings where proposals conserve the historic fabric and character of redundant or underused buildings, where alterations use sympathetic materials and alterations can be reversed. This is also reiterated through Policy ENP4, which seeks to support the retrofitting of existing buildings where alterations are sympathetic to local heritage. This is anticipated to contribute positively towards the historic environment by bringing redundant historic buildings back into use; helping to prevent their degradation or loss, and supporting their contribution to the wider historic environment in the neighbourhood area. Furthermore, Policy HE4 seeks to protect important local views that contribute to the historic character of the neighbourhood area, and Policy HE5 seeks to ensure development that could affect heritage assets, areas or features undertakes appropriate archaeological assessments, and provides opportunities to enhance community understanding of the historic environment. These are both considered to be beneficial in relation to the historic environment, by ensuring key features that contribute to the heritage value and character of the neighbourhood area are retained.
- 4.30 It is further recognised that policies seeking to maintain and enhance natural features in the neighbourhood area, such as Policy SA2, Policy E1, and Policy E3, are also anticipated to provide positive effects in relation to the historic environment. This is through maintaining and enhancing features that contribute to the setting of designated and non-designated heritage assets, areas and features. This is likely to help provide historic context to heritage, and contribute towards enhanced understanding of the historic environment in the neighbourhood area.

Land, soil, and water resources

- 4.31 The Harberton Parish Neighbourhood Plan works to safeguard and enhance land, soil and water resources. This is achieved through a policy focus on ensuring the efficient and effective use of land whilst protecting water quality and promoting sustainable resource management. Whilst the plan does not allocate specific sites for housing development, its housing policies contribute to maintaining and enhancing land, soil and water resources in the neighbourhood area. This is achieved through Policy HP1, which focuses growth towards areas that are already developed in the neighbourhood area. This reduces the likelihood of growth coming forward in undeveloped parts of the neighbourhood area that could hold greater amounts or higher quality resources. Additionally, Policy HP1 indicates that housing development will need to ensure adequate and appropriate foul water drainage is integrated into the development design, which is anticipated to protect natural resources by ensuring the potential for pollution via surface water runoff is reduced.
- 4.32 Furthermore, Policy HP5 seeks to secure the sustainable use of resources in new housing development. This includes the use of sustainable materials, and the promotion of water efficiency. Measures such as these are anticipated to provide positive effects in relation to land, soil and water resources, as they could reduce the need for new materials and ensure water resources are used appropriately.

- 4.33 To safeguard valuable agricultural soils, Policy E5 specifically supports small-scale ecologically sustainable farming, organic practices, and the provision of public allotments. Furthermore, Policy BE4 and HE3 promotes the reuse of existing structures, including redundant historic buildings, which further reduces the need for greenfield development to meet housing or employment needs in the neighbourhood area. Additionally, wider plan policies that encourage nature-based solutions and safeguard green infrastructure, for example Policy FL3, Policy SA2, Policy E1, and Policy E3, are also likely to contribute to protecting underlying soils.
- 4.34 Water resources and quality are addressed through a combination of efficiency and drainage requirements. This is demonstrated through Policy HP5, which supports development proposals where they incorporate water efficiency measures into their sustainable design. This will help to ensure appropriate amounts of water are used, and help to reduce wastage. Furthermore, Policy HP1 and Policy FL1 intend to support proposals where they incorporate adequate foul water drainage into design, and demonstrate that they will not adversely impact existing sewage systems. This helps to reduce the likelihood of water pollution linked to new development in the area. Additionally, design elements such as sustainable drainage systems proposed under Policy FL2 are anticipated to provide the dual benefit of reducing surface water runoff while inherently improving water quality through natural filtration.

Landscape

- 4.35 The Harberton Parish Neighbourhood Plan works to protect and enhance landscape character and quality in the neighbourhood area. Though it does not allocate specific sites for housing development, the housing policies contribute to maintaining and enhancing the landscape in the neighbourhood area. This is achieved through focusing growth towards areas that are already developed through Policy HP1. This helps to reduce the likelihood of growth coming forward in more landscape-sensitive parts of the neighbourhood area. Additionally, Policy HP1 indicates that development proposals will need to demonstrate that growth will not adversely affect the landscape setting and character of the neighbourhood area. This further contributes to the protection and enhancement of the landscape by ensuring growth is sensitively designed to avoid adverse effects.
- 4.36 Landscape is further considered through design stipulations that seek to ensure housing growth reflects the distinctive character and materials of the neighbourhood area, and minimises light pollution in order to contribute towards an aspirational dark skies designation – as demonstrated through Policy HP4. The focus on ensuring high quality design is anticipated to reduce the potential for adverse effects on landscape; rather, it could work to enhance landscape and villagescape character and quality in the neighbourhood area. Furthermore, Policy E1 and Policy HP3 seek to ensure that new growth respects landscape and villagescape character and quality by requiring all developments to conserve and enhance scenic beauty, and maintain housing densities that are consistent with the existing built environment. This will help to ensure new growth is complimentary of the landscape context, especially given the proximity of the South Devon National Landscape.
- 4.37 A core design element of the plan is the safeguarding of locally important views, as demonstrated by Policy E2 and Policy HE4, which protect vistas of farmland

and specific sight lines from intrusive development. To maintain the visual integrity of the settlement pattern, and thus help to protect villagescape character, Policy HP4 also requires new buildings to mirror traditional rooflines and forms whilst also avoiding the interruption of natural landscape horizons. These measures are anticipated to contribute positively towards landscape by ensuring key components of character in the neighbourhood area are maintained.

- 4.38 The plan's design strategy also emphasises the use of traditional materials and the retention of boundary features to prevent suburbanisation. Under Policy HP4 and Policy HE2, the plan outlines support for development where it incorporates a local palette of materials such as natural stone and slate, whilst protecting features like traditional Devon banks, stone walls, and native hedgerows. Again, this is anticipated to contribute positively towards landscape by ensuring new development visually integrates with the existing built environment, to minimise adverse visual effects and their potential to impact upon character and quality. This focus is also furthered through policies such as Policy FL2, Policy FL3, Policy SA2, Policy E1, and Policy E3, which seek to create and maintain natural features and green infrastructure – which is also anticipated to contribute positively towards landscape character, quality and views. Furthermore, the plan seeks to preserve rural atmosphere through Policy E6, which requires lighting strategies to minimise light spill to protect the neighbourhood area's valued dark skies.
- 4.39 Landscape protection extends to wider plan policies, such as Policy BE3 and Policy BE4 – which support farm diversification and the reuse of redundant buildings where character can be retained. Similarly, Policy ENP2 and Policy BE5 indicate that proposals for new energy and digital infrastructure will be supported where they are considerate of the landscape and are designed to minimise impacts to the South Devon National Landscape in proximity to the neighbourhood area. By integrating these cross-cutting requirements, the plan ensures that the villagescape character of Harberton and Harbertonford are maintained and enhanced, as is the wider neighbourhood area landscape character.

Transportation

- 4.40 The Harberton Parish Neighbourhood Plan establishes a policy framework that promotes sustainable transport use, active travel, and a reduced need for daily commuting. This includes ensuring future development is within or adjoins the existing built-up areas of Harberton and Harbertonford through Policy HP1, which is anticipated to encourage an uptake in active and sustainable transport opportunities (where possible) to access important local infrastructure and reducing the need to rely on private vehicles.
- 4.41 Recognising that the neighbourhood area faces significant challenges in relation to transportation, including a heavy reliance on private vehicles in Harberton and high traffic volumes on the A381 through Harbertonford, the plan seeks to prioritise infrastructure improvements that enhance safety and connectivity. This is demonstrated through Policy T1 and Policy T2, which focus on specific design elements such as the provision of additional pedestrian footways, cycle and e-bike storage, and safe crossings at critical points on the local road network. By seeking widened pavements and improved pedestrian infrastructure, the plan works well to create a built environment where walking

and cycling are safe, accessible and viable alternatives to relying on private vehicles.

4.42 The plan further supports the transition to low-emission travel through the integration of electric vehicle infrastructure into new developments. Policy T1 seeks to support residential and commercial development proposals where they include EV charging points, while Policy T3 specifically encourages the provision of charging facilities in communal and public parking spaces. These requirements are complimented by Policy T4, which ensures that new growth includes adequate off-street parking to prevent increased pressure on the neighbourhood area's local road network. Additionally, through Policy T5, the plan outlines the Parish Council's intention to introduce a 20mph limit through the village centres of Harberton and Harbertonford and install speed reduction warnings on the north and south approaches to Harbertonford, which will contribute towards a safer environment for active and sustainable transport users.

4.43 The plan also works to reduce the overall need to travel through Policy BE2 and Policy BE5, which support the development of co-working hubs and high-quality digital infrastructure. This will help to facilitate working from home and in the neighbourhood area, thus reducing the need for commuting and lowering the number of vehicles on the local road network.

Recommendations

4.44 During the earlier stages of plan making, the SEA put forward the following recommendations for consideration by plan makers tasked with drafting neighbourhood plan policies:

- 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 with reduced flood risk, given the high risk of fluvial and surface water flooding that the neighbourhood area experiences.
- 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.

4.45 The policy framework within the Regulation 14 version of the HPNP has reflected upon these recommendations, with the appraisal conclusions presented below.

Conclusions

- 4.46 Overall, the HPNP works well to maintain and enhance air quality in the neighbourhood area. This is due to the focus on design stipulations, to help encourage a shift towards active and sustainable travel methods, and the integration of green features into development design. Both are anticipated to help lower air quality pollutants linked to transport and improve air quality in the neighbourhood area. The level of growth likely to come forward during the plan period is unlikely to lead to significant changes in air quality associated with the AQMAs close by, nor air quality locally in Harberton or Harbertonford. Consideration is also given to the policy framework supported by the area wide Design Codes and Guidelines, which seek to reduce and mitigate adverse effects where possible. **Broadly neutral effects are concluded with respect to the air quality SEA theme.**
- 4.47 In relation to biodiversity and geodiversity, the policy framework seeks to protect and enhance existing features that contribute to biodiversity in the area whilst also outlining measures which seek to improve the connectivity and functionality of ecological networks and deliver net gains for nature. This includes through the focus on protecting green features and infrastructure, protecting the integrity of the dark skies and their contribution to the South Hams Bats SAC Landscape Connectivity Zone, and promoting nature-based solutions within development proposals. **Minor positive effects are concluded with respect to the biodiversity and geodiversity SEA theme.**
- 4.48 Overall, there is a clear focus on mitigating and adapting to the effects of climate change in the neighbourhood area. The HPNP works well to reduce emissions in a sustainable way, through encouraging renewable energy and sustainable and active transportation uptake. It also works to reduce the potential risk and effects of flooding in the neighbourhood area, in recognition of the acute vulnerabilities experienced within the villages and in response to recent local flooding events. The integration of nature-based solutions into development design will help to increase the resilience of the neighbourhood area to the ongoing effects of climate change. **Minor positive effects are concluded with respect to the climate change SEA theme.**
- 4.49 Community wellbeing is embedded into the HPNP. Whilst it does not allocate sites for housing development itself, the HPNP includes policies that will help ensure housing growth reflects the needs of the community and helps to retain diversity in the population of the neighbourhood area. There is a strong focus on supporting active lifestyles, through encouraging engagement with active and sustainable transportation and safeguarding green spaces. The health and wellbeing of the community is further maintained through policies which seek to retain infrastructure and improve access to employment opportunities.
- 4.50 In the absence of any specific site allocations within either of the sustainable villages identified through the Plymouth and South West Devon JLP, the neighbourhood area is likely to receive speculative proposals for development during the plan period with a view to meeting the identified housing need within the JLP. In recognition of this, the HPNP has a strong focus on ensuring that high-quality design is delivered through new development areas, and incorporates several local provisions through policy (and an accompanying [Design Codes and Guidelines](#) document) with a view to meeting community aspirations and vision for the neighbourhood area. Overall, **minor positive**

effects are considered concluded for the community wellbeing SEA theme over the short and medium term, with an element of uncertainty in the longer term due to the absence of any specific site allocations at this stage of plan making.

- 4.51 It is recognised that development within either of the sustainable villages would likely adversely impact the heritage sensitivities and significance of the neighbourhood area. However, the policy framework within the HPNP has a strong focus on protecting and enhancing the rich heritage resource in the neighbourhood area, notably through the stipulations within the Design Codes and Guidelines document. Growth during the plan period is therefore likely to safeguard local distinctiveness and apply placemaking principles which respect the special historic interest, character and appearance of heritage assets and areas (and their settings). On balance, **broadly neutral effects are concluded for the Historic Environment SEA theme.**
- 4.52 Regarding land, soil, and water resources, it is recognised that the HPNP policy framework seeks to protect key features of landscape and biodiversity interest, which will indirectly support land, soil and water resources by safeguarding green infrastructure networks and facilitating improvements to the public realm. It is recognised that in the absence of available brownfield sites within the neighbourhood area, speculative applications are likely to come forward on greenfield sites which may be underlain by areas of best and most versatile agricultural land. **On this basis, an element of uncertainty is noted at this stage of plan making with respect to the land, soil, and water resources SEA theme, given the absence of any specific site allocations.**
- 4.53 Protecting and enhancing landscape character and quality, including that of the built environment in the neighbourhood area, is important to the community. This importance is reflected in the policy provisions of the HPNP, which seek to ensure new development is sympathetic to the wider landscape context, including through materials used, and boundary treatments. The policy framework also seeks to safeguard character and quality by identifying locally important views, incorporating green infrastructure and natural features into the design of schemes, and ensuring that any reuse of redundant buildings in the rural countryside respects its landscape setting. **Minor positive effects are concluded with respect to the landscape SEA theme.**
- 4.54 Regarding transportation, the policy framework supports active travel and encourages a shift toward more sustainable modes of transport where feasible. The HPNP also includes measures to address local priorities, for example in relation to parking provision, road safety, and improving connectivity and walkability between key locations. Overall, **broadly neutral effects are concluded for the Transportation SEA theme.**

5. Next steps and monitoring

Plan Finalisation

- 5.1 Following Regulation 14 consultation, responses will be considered in finalising the HPNP and SEA for submission. Following submission, the HPNP and supporting evidence will be published for further consultation and then subject to Independent Examination. At Independent Examination, the HPNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 5.2 If the examination leads to a favourable outcome, the HPNP will then be subject to a referendum, organised by South Hams District Council. If more than 50% of those who vote agree with the HPNP, then it will be 'made'. Once 'made', the HPNP will become part of the Development Plan for Plymouth and South West Devon, covering the defined neighbourhood area.

Monitoring

- 5.3 The SEA regulations require '*measures envisaged concerning monitoring*' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 5.4 It is anticipated that monitoring of effects of the HPNP will be undertaken by South Hams District Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the HPNP that would warrant more stringent monitoring over and above that already undertaken by South Hams District Council.
- 5.5 Additionally, a monitoring framework for the Parish Council to follow is contained in Appendix 6 within the draft HPNP. The HPNP states that the Council will report on progress towards achieving the HPNP objectives at the annual general meeting. A full review of the HPNP (once adopted) is expected after five years.

