

Clyst Honiton Neighbourhood Plan: Strategic Environmental Assessment

Environmental Report to accompany the submission
version of the Neighbourhood Plan

January 2024



Quality information

Prepared by	Checked by	Verified by	Approved by
Emma Hazell Environmental Planner	Rosie Cox Senior Environmental Planner	Nick Chisholm-Batten Technical Director	Nick Chisholm-Batten Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
V2.0	13/01/23	Draft for group comment	21/01/23	Janvrin Edbrooke	Clyst Honiton Neighbourhood Plan coordinator
V3.0	13/03/23	Consultation version	13/03/23	Nick Chisholm- Batten	Technical Director
V4.0	27/11/23	Submission version	27/11/23	Nick Chisholm- Batten	Technical Director
V5.0	31/01/24	Updated submission version	31/01/24	Nick Chisholm- Batten	Technical Director

Prepared for:

Clyst Honiton Parish Council

Prepared by:

AECOM Limited
Plumer House
Third Floor, East Wing
Tailyour Road
Crownhill
Plymouth PL6 5DH
United Kingdom

T: +44 (1752) 676700
aecom.com

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Non-Technical Summary

What is Strategic Environmental Assessment?

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

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

What is the Clyst Honiton Neighbourhood Plan?

The Clyst Honiton Neighbourhood Plan (CHNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The CHNP is being prepared in the context of the East Devon Local Plan, which was adopted in January 2016, with due regard to the emerging Local Plan. It is currently anticipated that the Neighbourhood Plan will be submitted to East Devon District Council later in 2023 for subsequent independent examination.

Purpose of this Environmental Report

This Environmental Report, which accompanies the submission 'Regulation 16' version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2020), which includes information about the Neighbourhood Plan area's environment and community. The second document was the Environmental Report which accompanied an earlier pre-submission version of the Neighbourhood Plan, prepared in late 2020. The third document was the Environmental Report accompanying Regulation 14 consultation on the Neighbourhood Plan (March 2023).

The purpose of this Environmental Report is to:

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

The Environmental Report contains:

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

Assessment of alternative approaches for the CHNP

Context for growth in Clyst Honiton

In the last ten years significant strategic-scale growth has taken place in and around the Neighbourhood Plan area, including as part of part of the Exeter and East Devon Growth Point and the subsequent Exeter and East Devon Enterprise Zone.

In terms of housing growth, the ongoing development of Cranbrook to the north east of the Neighbourhood Plan area will lead to the development of a town of 7,800 residents by the end of the East Devon Local Plan period in 2031. In addition, 1,480 homes will be delivered at the North of Blackhorse / Redhayes development site by 2031, located to the west of Clyst Honiton.

Residential growth has been accompanied by the delivery of significant areas of new employment land, including at Skypark, Exeter Science Park, Exeter International Airport, Exeter Airport Business Park and at Cranbrook.

To support this strategic-scale growth, significant transport improvements have also been delivered. This has included the opening of the Clyst Honiton Bypass in 2014, the widening of B3184 access road to Exeter Airport in 2015, and the opening of Cranbrook railway station in late 2015.

This strategic-scale growth has affected Clyst Honiton in a number of ways. In terms of community facilities, the limited provision previously available in the village has been undermined; for example, Clyst Honiton Primary School (a key community facility for the village) was closed and relocated to Cranbrook in 2012. The village is also increasingly seen as an 'island' amongst areas of recent development.

In light of these issues, consultation undertaken for the CHNP to date has indicated a strong desire for the Neighbourhood Plan to deliver new community infrastructure to serve the residents of the parish. This is in part to offset recent losses, and to also maintain and enhance the viability and vitality of the village into the future. In addition, there was a recognition of the need to increase housing choice in the village.

As such, there was a clear indication from consultation that appropriate growth in the village would be supported if it increased housing choice and enabled the delivery of new community facilities.

Assessment of available sites

To explore potential locations for development of this type, a Call for Sites was undertaken for the Neighbourhood Plan, accompanied by a number of consultation events. This was with a view to identifying potential sites in the vicinity of the village which may be available for allocation through the Neighbourhood Plan.

This process led to the identification of six potential sites.¹ These sites then underwent a Neighbourhood Plan site appraisal which considered the suitability, availability and deliverability of the sites.²

To support the consideration of the suitability of these sites for potential allocation in the Neighbourhood Plan, the SEA process has undertaken an assessment of the key environmental constraints present at each of the sites and potential effects that may arise as

¹ Seven sites were initially identified. However, one of these sites lies virtually wholly within the Exeter Airport Public Safety Zone (PSZ), as defined by the Department for Transport. The objective of PSZs is that there should be no increase in the number of people living, working or congregating in the PSZ and that, over time, the number should be reduced as circumstances allow (e.g. when any redevelopment takes place). As such the site was not appraised.

² AECOM (2017) Site Appraisal for the Clyst Honiton Neighbourhood Plan

a result of development at these locations. This SEA site assessment was undertaken separately to the Neighbourhood Plan site appraisal.

The locations of the six sites assessed through the SEA process are presented in the map below, with the subsequent table summarising the findings of the assessment. Table 4.1 to Table 4.6 in the main body of this Environmental Report present full findings.



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LEGEND

- Clyst Honiton Neighbourhood Plan Area
- Site Option

SEA1: Land adjacent to Clyst Honiton Bypass
 SEA2: Land to the south west of Clystside
 SEA3: Land within the ownership boundary of Clyst House
 SEA4: Land occupied by SW Slating & Tiling Ltd, adjacent to Honiton Road
 SEA5: Glebe lands/allotments adjacent to Honiton Road
 SEA6: Briar House

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Purpose of Issue
DRAFT

Client
CLYST HONITON PARISH COUNCIL

Project Title
SEA OF THE CLYST HONITON NEIGHBOURHOOD PLAN

Drawing Title
SITES ASSESSED FOR THE SEA OF THE CLYST HONITON NEIGHBOURHOOD PLAN

Drawn CN	Checked JW	Approved CB	Date 23/09/2020
AECOM Internal Project No. 60571087		Scale @ A4 1:3,000	

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AECOM
 Microsoft
 Aeron Link, Basingstoke
 Hampshire, RG21 7PP
 Telephone: 01256 310200
 Fax: 01256 310201
 www.aecom.com

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FIGURE 4.2

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File Name: 150504 - Information Systems\60571087_Neighbourhood Plan_CPB_2018_202020_Maps\Clyst Honiton Parish Council\Figure 4.2 - Sites Assessed for SEA.mxd



Table NTS1: Summary of SEA site assessment findings

Site	Env. Quality	Bio-diversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population	Health and Wellbeing	Transport
SEA1									
SEA2									
SEA3									
SEA4									
SEA5									
SEA6									

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

Choice of site allocations taken forward for the Regulation 14 draft Neighbourhood Plan

The Regulation 14 version of the Neighbourhood Plan allocated three sites for up to 64 homes.

The key allocation proposed by the Regulation 14 version of the Neighbourhood Plan was a mixed-use development taken forward on the site adjacent to the Clyst Honiton Bypass. This would comprise up to 49 residential units, up to 2,400 m² of employment floor space and a multi-use community facility. The site allocation is being progressed through a Neighbourhood Development Order, which has been developed in parallel with the Neighbourhood Plan.

The Regulation 14 version of the Neighbourhood Plan stated the following reasons for the allocation:

“Policy SA3 seeks the development of a mixed-use site (Figure 43) to enable the delivery of a new community building which is the key driver underpinning the production of the Clyst Honiton Neighbourhood Plan. A site Masterplan (Figure 44) includes details on the scheme.”

In addition, the Regulation 14 draft Neighbourhood Plan allocated two further sites for housing:

- Slating and Tiling Site, York Terrace: Up to nine 1 and 2 bedroom dwellings fronting on to York Terrace; and
- Existing allotment site, York Terrace: Six dwellings fronting on to York Terrace, comprising 1 and 2 bed units, suitable for both young people and those wanting to downsize. This is subject to an alternative allotment site being identified.

The stated reasons for these allocations in the Regulation 14 draft version of the Neighbourhood Plan were as follows:

“Policy SA1 seeks the provision of small properties close to existing village amenities suitable for occupation by older people who are seeking to downsize from their existing property and by those starting on the property ladder who wish to remain within the community.”

and

“Policy SA2 seeks the provision of small properties close to existing village amenities suitable for the occupation of older people wanting to downsize from their existing property and those starting on the property ladder who wish to remain within the community.”

Assessment of earlier versions of the Neighbourhood Plan

An appraisal of an earlier version of the draft Neighbourhood Plan was presented in the Environmental Report accompanying an early Regulation 14 consultation undertaken in late 2020.³

Subsequent to this, in March 2023 AECOM assessed the revised Pre-Submission Regulation 14 draft of the Neighbourhood Plan, including policies and individual sites, as identified above. This assessment is presented in the Environmental Report accompanying Regulation 14 consultation.⁴

After Regulation 14, responses to the CHNP from the community, statutory authorities and a Plan Health check undertaken by Intelligent Plans and Examinations (IPE) were processed by the Steering Group which resulted in extensive changes to the Draft Plan and appendices.

It was also agreed that the CHNP would be submitted ahead of the Clyst Honiton Neighbourhood Development Order (NDO), which required further technical work.

A number of policies were deleted from the NP, while others were amalgamated. The most noteworthy changes related to the deletion of housing site allocation policies. This is discussed further below.

Choice of site allocations taken forward for the Regulation 16 submission version of the Neighbourhood Plan

Post Regulation 14 ‘the Allotment site’ and ‘Clyst Honiton Bypass Site’ allocations were withdrawn from the Neighbourhood Plan. The following reasons for this have been provided by the Steering Group:

The Allotment Site: In the Site Consultation event, the present allotment site being used to provide housing was not well received, which was not unexpected, because having lost so many of their community assets the residents did not wish to lose the allotments as well. At the time of this consultation the provision of alternative allotments could not be promised to the locals as it had not been finalised by the landowner. After the consultation alternative allotments were provided and it was agreed to put the Allotment Site out to Regulation 14 consultation. At Regulation 14 advice from Exeter and Devon Airport Authority Limited notified the Steering Group that the alternative allotments crossed the Public Safety R Zone, where land for allotment use is unacceptable from a safety perspective. This resulted in the Allotment Site and the proposed alternative allotment space being deleted from the Neighbourhood Plan as development of the Allotment Site was dependent on the alternative space coming forward.

Clyst Honiton Bypass Site: This site was withdrawn from the Neighbourhood Plan on feedback received at Regulation 14 which advised the Steering Group that delivery of the site was best delivered through the Clyst Honiton Neighbourhood Development Order (NDO). The feedback received led to the Steering Group agreeing that allocating the site in the Neighbourhood Plan would undermine the NDO and would endanger the delivery of the

³ AECOM (September 2020) SEA Environmental Report to accompany the Regulation 14 ‘Pre-submission’ version of the Clyst Honiton Neighbourhood Plan

⁴ AECOM (March 2023) SEA Environmental Report to accompany the Regulation 14 ‘Pre-submission’ version of the Clyst Honiton Neighbourhood Plan

much-needed community building. This was because within the Neighbourhood Plan the Clyst Honiton Bypass Site offered an alternative planning approach which provided less security for the delivery of a community building, housing and economic units.

In response to this, the submission (Regulation 16) Neighbourhood Plan brings forward one housing site (Slate and Tile Site) for up to nine houses. This site is not free from constraint as it is located partially within the fluvial floodplain. As such there is a need to consider sequential testing requirements. It is recognised that the only alternative site (located outside of the fluvial floodplain) at this stage would be Site SEA3 (Land within the ownership boundary of Clyst House). This site has been rejected due to significant historic environment and landscape setting impacts that would be very difficult to overcome/mitigate. In progressing the Slate and Tile Site there is an opportunity to apply sequential testing on-site and avoid vulnerable development within areas of higher flood risk and deliver flood risk mitigation that could reduce the significance of effects and increase long-term resilience.

The community's desire for houses to provide a free community building will be delivered through the Clyst Honiton NDO.

Assessment of the current version of the CHNP

The current submission version of the CHNP presents 23 planning policies for guiding development in the Neighbourhood Plan area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the CHNP. Previous iterations of this policy framework have been assessed through the SEA, as set out in the main part of this Environmental Report (section 4.22 – 4.23).

The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Environmental Quality
- Biodiversity
- Climate Change
- Landscape
- Historic Environment
- Land, Soil and Water Resources
- Population and Community
- Health and Wellbeing
- Transportation

The assessment has concluded that the current version of the CHNP is likely to lead to significant positive effects in relation to the 'Population and Community' SEA theme. These benefits largely relate to the Neighbourhood Plan's focus on delivering housing which meets local needs, improving the quality of life of residents and promoting community vitality. In addition, the Neighbourhood Plan's close focus on community infrastructure development, green infrastructure enhancements, pedestrian and cycle network improvements and the delivery of a high-quality public realm will lead to significant positive effects in relation to the 'Health and Wellbeing' and 'Transportation' SEA themes.

With regards to the 'Land, Soil and Water Resources' SEA theme, positive effects are considered as the site allocation is focused on brownfield land, supporting the efficient use of land within the Neighbourhood area.

In relation to the 'Climate Change' theme, the Neighbourhood Plan seeks to deliver energy efficient development, facilitate renewable energy provision, and encourage sustainable transport and electric vehicle use. This will support climate change mitigation. It also closely recognises the flood risk issues present in the neighbourhood area and at the site allocation and provides an additional level of protection and the necessary mitigation. As such, it is considered that the Neighbourhood Plan will have broadly neutral to minor positive effects in relation to climate change adaptation.

Otherwise, in relation to the 'Landscape' and 'Historic Environment' themes, the CHNP policies will provide a robust basis for the protection and enhancement of landscape and villagescape character in the neighbourhood area and the conservation of historic environment assets in Clyst Honiton (and their settings). The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Environmental Quality' and 'Biodiversity' SEA themes. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

Next Steps

The CHNP and this Environmental Report have been submitted to the Local Planning Authority, East Devon District Council, for independent examination. At independent examination, the CHNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

Assuming the examination leads to a favourable outcome, the CHNP will then be subject to a referendum, organised by East Devon District Council. If more than 50% of those who vote agree with the CHNP, then it will be 'made'. Once 'made', the CHNP will become part of the development plan for East Devon District Council, covering the defined neighbourhood area.

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Clyst Honiton's emerging Neighbourhood Plan.
- 1.2 The Clyst Honiton Neighbourhood Plan (CHNP) is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the East Devon Local Plan.
- 1.3 The Neighbourhood Plan has been submitted to East Devon District Council and will likely undergo a referendum in 2024.
- 1.4 Key information relating to the CHNP is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Clyst Honiton Neighbourhood Plan

Name of Responsible Authority	East Devon District Council
Title of Plan	Clyst Honiton Neighbourhood Plan (CHNP)
Subject	Neighbourhood Planning
Purpose	The CHNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the East Devon Local Plan. The CHNP will be used to guide and shape development within the designated neighbourhood area.
Timescale	To 2031
Area covered by the plan	The neighbourhood area covers part of the parish of Clyst Honiton in East Devon (Figure 1.1)
Summary of content	The CHNP will set out a vision, objectives, strategy and range of policies to guide future development within the designated neighbourhood area. The Neighbourhood Plan seeks to allocate development sites to deliver around 60 new dwellings, employment land and community infrastructure.
Plan contact point	Janvrin Edbrooke, Neighbourhood Plan coordinator janvrinedbrooke@gmail.com

SEA explained

- 1.5 Strategic Environmental Assessment (SEA) is a mechanism for considering and communicating the impacts of an emerging plan, and potential alternatives in terms of key sustainability issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts. Through this approach, the SEA for the CHNP seeks to maximise the developing plan's contribution to sustainable development.
- 1.6 SEA is undertaken to address the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.7 The CHNP has been screened in by East Devon District Council as requiring an SEA. To meet this requirement, the Neighbourhood Plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.8 The SEA will be undertaken to meet specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.9 Two key procedural requirements of the SEA Regulations are that:
 - 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; and
 - A report (the 'Environmental Report') is published for alongside the Draft Plan that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 The Environmental Report comprises the second bullet above.

Structure of this Environmental Report

1.11 This document is the SEA Environmental Report for the CHNP 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 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory⁵ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁶
What's the scope of the SEA?	<ul style="list-style-type: none"> • An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.
What is the sustainability 'context'?	<ul style="list-style-type: none"> • The relevant environmental protection objectives, established at international or national level. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> • The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. • The environmental characteristics of areas likely to be significantly affected. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues & objectives?	<ul style="list-style-type: none"> • Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> • Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). • The likely significant effects associated with alternatives. • Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> • The likely significant effects associated with the plan. • The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan. • The next steps for plan making / SEA process.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

⁶ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the Clyst Honiton Neighbourhood Plan

Local Plan context for the neighbourhood plan

- 2.1 The CHNP is being prepared in the context of the East Devon Local Plan (2013-2031), which was adopted in January 2016. The East Devon Local Plan will be the principal document of the statutory development plan for the district in order to facilitate for East Devon's growth needs to 2031. The Local Plan sits alongside the Village Development Plan Document (DPD), which is specifically concerned with reviewing and defining development boundaries around villages.
- 2.2 A new Local Plan is currently being prepared for East Devon. Consultation on the Draft Local Plan took place between November 2022 and January 2023. Comprising an initial draft plan⁷, it highlights that housing provision in the Clyst Honiton neighbourhood area will be identified following consultation on the methodology for identifying the scale of housing provision requirement in Designated Neighbourhood Areas.
- 2.3 No specific provisions for Clyst Honiton are set out in either of the existing Local Plan documents, or the emerging draft Local Plan 2020 to 2040, including relating to a specific quantum of housing and employment provision. However, the new Local Plan acknowledges that *"Emerging and advancing plans at Clyst Honiton and Broadclyst are seeking to bring their own preferred sites forward for development and to ensure all future development meets their local needs and deliver real benefits for their local communities."*
- 2.4 In this respect the Clyst Honiton Neighbourhood Plan Steering Group is keen to take a sustainable approach to development within the neighbourhood area, given its rural location and character and in recognition of the need to facilitate appropriate development to support the continued vitality of the community.

⁷ EDDC (November 2022) East Devon Local Plan 2020 to 2040 Preferred Options Reg. 18 Consultation Draft Plan Current draft - autumn 2022

Vision, aims and objectives for the neighbourhood plan

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

“

Clyst Honiton is a happy and healthy community which is inspired by positive change for those living and working in the Plan Area.

The wellbeing of our rural and village communities is enhanced by spaces which provide a strong community and business focus which harness community spirit.

Clyst Honiton aspires to be an attractive, friendly, safe place, encouraging a diverse community to set down their roots and value their river and rural landscape.

”

Vision Statement for the Clyst Honiton Neighbourhood Plan

2.6 To support the vision statement, the Neighbourhood Plan outlines 26 key aims which aim to deliver the aspirations for Clyst Honiton. These aims, which are grouped under six key themes, are as follows:

Community Facilities

- To protect, enhance and develop new community assets, facilities and services.

Design

- To support zero carbon energy use, low carbon homes and the production of renewable energy.
- For development to include designs and structures that provide effective flood management and minimize flood risk.
- To encourage energy efficient and sustainable development.
- To support the development of residential and businesses of high-quality design.
- To improve access to high-speed communication services.

Economy

- To provide new businesses and employment within the Plan Area.
- To support the regeneration of sites for business in the village.
- To support the growth of new and existing business premises in Clyst Honiton village.

Housing

- To provide new housing in Clyst Honiton village.
- For housing to provide a community facility

- To provide a balanced housing stock to enable local people to stay in the parish throughout their lifetime.
- To ensure a range of tenure is provided across the new developments. To support appropriate development outside of the village which supports the rural economy and local needs.

Natural Environment

- To protect, develop and extend local green spaces.
- To retain and enhance the semi-rural, non-urban character of the Clyst Honiton village.
- To protect and increase the Areas' landscape and biodiversity.

Parking and Access

- To improve car parking provision for existing and new residents and businesses.
- To improve the public realm of Clyst Honiton Village Road and its junctions.
- To develop new footpaths, cycle paths and mobility networks for health, leisure and work purposes across the Plan Area.

The Neighbourhood Development Order

- 2.7 Due to the loss of various community facilities in the parish following the development of the Cranbrook new community and Skypark, consultation undertaken during early stages of development of the Neighbourhood Plan showed that there was a strong desire for the CHNP to facilitate the delivery of a new community facility.
- 2.8 Neighbourhood Development Orders (NDOs) grant planning permission for specific development in a particular area. An NDO could be used to grant outline planning permission for specified uses on allocated sites, such as housing, commercial uses or recreational uses.
- 2.9 As the Neighbourhood Plan has developed, it has become apparent that an NDO may be an appropriate mechanism to allow the provision of a community building to be delivered alongside the Neighbourhood Plan on a suitable site.
- 2.10 In this respect, through taking forward an NDO for a specific site in Clyst Honiton, the development would be able to go ahead without the need to submit a planning application. This would provide certainty to developers on the site relating to planning conditions and infrastructure requirements, including associated with a community facility.
- 2.11 Given it relates to development at the project rather than plan level, an SEA is not required on the NDO.⁸ National guidance however highlights that an NDO may need to undergo a project-level Environmental Impact Assessment (EIA). In this respect EIA screening was undertaken in early 2020, with an EIA Screening Report consulted on with the statutory consultees for EIA in mid-2020. Subsequent to this process, it was confirmed in September 2020 by East Devon District Council that a full EIA was not required to be undertaken for the NDO.

⁸ The proposals for the site now covered by the NDO (Site adjacent to the Clyst Honiton Bypass) set out in the umbrella Neighbourhood Plan have however been considered through the current SEA process.

3. What is the scope of the SEA?

SEA Scoping Report

- 3.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁹ These authorities were consulted on the scope of the CHNP SEA in May 2020.
- 3.2 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.
- 3.3 Baseline information (including the context review and baseline data) is presented in **Appendix A**.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1**.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Natural England	
Victoria Kirkham, Consultations Team	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Comment noted.
Historic England	
David Stuart: Historic Places Adviser, South West	
There are no comments we wish to make on the Report other than to recommend the addition of our guidance on Site Allocations in Local Plans to those references which we are pleased to see you have already included. This guidance is also relevant to Neighbourhood Plans.	Comment noted.
Environment Agency	
Harriet Fuller, Planning Advisor, Sustainable Places	

⁹ 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*’.

Consultation response

How the response was considered and addressed

In general we consider that it is unlikely that neighbourhood plans will result in any significant environmental effects unless the plan allocates or encourages development over that set out in the Local Plan. Otherwise we consider that any potential for environmental effects from growth in the parish should already have been addressed through the Sustainability Appraisal (SA) which supported the adopted Local Plan.

Comment noted.

Key Sustainability Issues

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

Environmental Quality

- There are no AQMAs within or near the neighbourhood area.
- Aircraft noise from Exeter Airport could exceed desirable levels in a worst-case scenario. Suitable building design and other potential mitigation measures such as careful consideration of the location of new development could potentially be used to alleviate this.
- Noise from the road network within, adjacent and in close proximity to the neighbourhood area has the potential to disturb future and current residents and will require suitable mitigation measures.

Biodiversity

- The neighbourhood area is located within the recreational impact zone to the East Devon Pebblebed Heaths (SPA, SAC & SSSI) and the Exe Estuary (SPA, Ramsar and SSSI)
- BAP habitats, including farmland, traditional orchards, deciduous woodland, coastal and floodplain grazing marsh within the neighbourhood area have some potential to host a variety of priority species.
- Development could provide an opportunity to seek biodiversity net gain at both a site-specific scale and as part of wider habitat networking.

Climate Change

- Emissions from the built environment in East Devon are falling over time and have dropped by 68% since 2005, though at a slower rate in more recent years. The transport sector in East Devon contributed the most to CO₂ emissions in 2017.
- East Devon District Council declared a climate emergency in July 2019, and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- Significant parts of Clyst Honiton village are affected by Flood Zone 3, the highest fluvial flood risk zone.
- Surface water flood risk affects a similar extent of the neighbourhood area, spanning across the network of tributaries that stem from the River Clyst.

Landscape and Historic Environment

- The landscape character of Clyst Honiton is influenced by the presence of major infrastructure assets within and adjacent to the Plan area, including Exeter International Airport, the M5 and the A30. These features all impart a degree of severance from the wider rural landscape.
- The Clyst Honiton Plan area is within the 'Devon Redlands' NCA, and the Clyst Lowlands Farmland LCT, with classically rural features, including hilly landscapes and mixed farming. Development could be designed and laid out in a manner which responds sympathetically to this when appropriate.

Historic Environment

- There are ten listed buildings or structures within the Plan area. Of these, nine are listed as Grade II and one is listed as Grade II*.
- Key designated heritage assets are clustered at and around the Church of St Michael.
- The Church of St Michael is on Historic England's heritage at risk register.
- Clyst Honiton village contains the majority of features listed on the HER in the neighbourhood area.

Land, Soil and Water Resources

- The River Clyst, which runs through the north east side of the neighbourhood area, is not of sufficient water quality to record 'good' ecological status.
- The northern portion of the Plan area is underlain by high quality agricultural land (Grade 1), particularly concentrated around the built area of the village. The remainder of the Plan area is underlain by Grade 3 land.
- The entirety of the neighbourhood area falls within a Nitrate Vulnerable Zone (NVZ).

Population and Community

- The largest age category within the population is the 25-44 group (27.63%), though figures for residents over the age of 60 is higher than national and regional averages (24.67%), indicating an ageing population.
- Levels of deprivation within the Plan area (58.33%) are slightly higher than comparative figures for East Devon, the South West and England as a whole.
- Clyst Honiton has seen a significant recent reduction in the services, facilities and amenities available in the village. In this context, the Neighbourhood Plan has significant potential to support the delivery of new community infrastructure.

Health and Wellbeing

- Overall health in the Clyst Honiton area is generally good, most residents indicate that their health is either 'good' or 'very good' (81.58%), higher than district level, regional and national averages.
- There are no healthcare facilities within the Plan area itself, reflecting the fact Clyst Honiton is a small settlement well connected to nearby higher tier settlements. The closest available medical facilities are located in central Exeter.

Transportation

- Significant development in the wider area associated with east of Exeter expansion has the potential to increase traffic flows in the parish. However, it also offers opportunities for enhancements to local transport networks.

- The A30 runs through the neighbourhood area, which can become increasingly congested during the peak summer tourism season.
- Traffic and parking pressures linked to Exeter International Airport is an issue for parts of the village during peak periods.
- A significant proportion of residents work or run a business from home, offering opportunities for the Neighbourhood Plan to support development which encourages homeworking.

3.6 Development within Clyst Honiton could potentially contribute towards opportunities to improve sustainable transport networks in the area, particularly footpaths and cycle routes.

SEA Framework

3.7 The issues were then translated into an ‘SEA Framework’. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the CHNP is presented below.

Table 3.2: SEA Framework for the Clyst Honiton Neighbourhood Plan

SEA objective	Assessment Questions: Will the proposal / option...
<i>Environmental Quality</i>	
Improve noise quality in the neighbourhood area.	<ul style="list-style-type: none"> • Implement measures (such as noise screening) so that current and future residents will not be regularly exposed to nearby noise from Exeter International Airport and nearby transport routes? • Locate and design development so that current and future residents will not regularly be exposed to poor noise quality?
<i>Biodiversity</i>	
Protect and enhance all biodiversity features.	<ul style="list-style-type: none"> • Protect and enhance natural habitats, including farmland, woodland? • Protect and enhance sites with local wildlife value? • Support the protection of SSSI IRZs? • Achieve a net gain in biodiversity? • Support enhancements to ecological networks, including through improvements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
<i>Climate Change</i>	
Support the resilience of the neighbourhood area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Avoid development in areas at risk of flooding from the River Clyst, considering the likely future effects of climate change? • Increase resilience of the built and natural environment to the effects of climate change? • Ensure that the potential risks associated with climate change are considered in new development in the Plan area? • Sustainably manage water run-off, reducing surface water runoff (either within the Plan area or downstream)?

SEA objective	Assessment Questions: Will the proposal / option...
Reduce the level of contribution to climate change made by activities within the neighbourhood area.	<ul style="list-style-type: none"> • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce the need to travel or the number of journeys made? • Promote the use of sustainable modes of transport, including walking, cycling and public transport?
<i>Landscape</i>	
Protect and enhance the character and quality of landscapes and villagescapes where appropriate.	<ul style="list-style-type: none"> • Conserve and enhance the landscape character of the Plan area? • Conserve and enhance locally characteristic areas and their setting? • Conserve and enhance local diversity and settlement identity? • Retain and enhance existing landscape features within development sites? • Protect locally important viewpoints contributing to the sense of place and visual amenity of the neighbourhood area?
<i>Historic Environment</i>	
Protect and enhance the significance of the historic environment, heritage assets (both designated and non-designated) and their settings.	<ul style="list-style-type: none"> • Conserve and where possible enhance the significance of buildings and structures and their setting? • Preserve the significance and integrity of designated assets within the Plan area? • Support access to, interpretation and understanding of the historic environment? • Conserve and enhance archaeological remains and support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Conserve and enhance archaeological remains, including historic landscapes?
<i>Land, Soil and Water Resources</i>	
Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid development of the best and most versatile agricultural land (Grades 1 to 3a)?
Protect and enhance water quality and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality? • Support measures which seek to minimise water consumption? • Ensure the timely provision of wastewater infrastructure? • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect groundwater and surface water resources from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling?
<i>Population and Communities</i>	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing residents, particularly the ageing population of the area? • Improve the availability and accessibility of basic amenities, including specialist services?

SEA objective	Assessment Questions: Will the proposal / option...
<p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
<p><i>Health and Wellbeing</i></p>	
<p>Improve the health and wellbeing of residents within the neighbourhood area.</p>	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use? • Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths? • Promote accessibility to local health services? • Cater for the needs of the ageing population and those that require specialist medical care?
<p><i>Transport</i></p>	
<p>Promote sustainable transport use and reduce the need to travel</p>	<ul style="list-style-type: none"> • Improve access to improved public transport connections to key centres, such as bus networks within Exeter? • Encourage a modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure improvements, particularly for public rights of way and active travel opportunities? • Facilitate working from home and remote working? • Improve road safety? • Reduce congestion?

4. Assessment of reasonable alternatives for the neighbourhood plan

Introduction

- 4.1 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the CHNP. The SEA Regulations¹⁰ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘plan and reasonable alternatives taking into account the objectives and geographical scope of the plan’.
- 4.2 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.3 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the neighbourhood area and potential locations for development. Specifically, this chapter explains how the Neighbourhood Plan’s development strategy has been shaped through considering alternative approaches for the potential location of development.

The context for growth in Clyst Honiton

- 4.4 In the last ten years significant strategic-scale growth has taken place in and around the neighbourhood area, including as part of part of the Exeter and East Devon Growth Point and the subsequent Exeter and East Devon Enterprise Zone.
- 4.5 In terms of housing growth, the ongoing development of Cranbrook to the north east of the neighbourhood area will lead to the development of a town of 7,800 residents by the end of the East Devon Local Plan period in 2031. In addition, 1,480 homes will be delivered at the North of Blackhorse / Redhayes development site by 2031, located to the west of Clyst Honiton.
- 4.6 Residential growth has been accompanied by the delivery of significant areas of new employment land, including at Skypark, Exeter Science Park, Exeter International Airport, Exeter Airport Business Park and at Cranbrook (**Figure 4.1**).
- 4.7 To support this strategic-scale growth, significant transport improvements have also been delivered. This has included the opening of the Clyst Honiton Bypass in 2014, the widening of B3184 access road to Exeter Airport in 2015, and the opening of Cranbrook railway station in late 2015.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

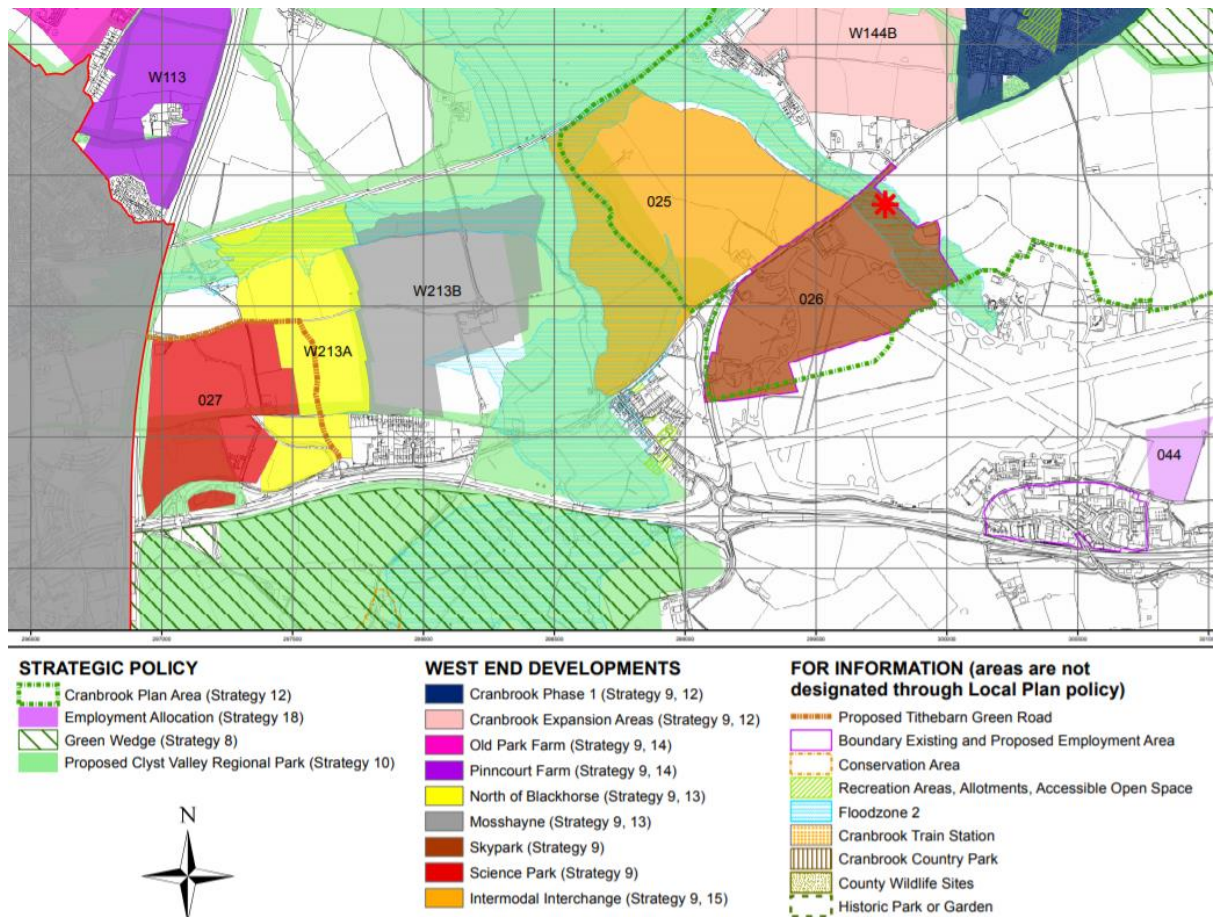


Figure 4.1: East Devon Local Plan: West End inset map

- 4.8 This strategic-scale growth has affected Clyst Honiton in a number of ways. In terms of community facilities, the limited provision previously available in the village has been undermined; for example, Clyst Honiton Primary School (a key community facility for the village) was closed and relocated to Cranbrook in 2012. The village is also increasingly seen as an ‘island’ amongst areas of recent development.
- 4.9 In light of these issues, consultation undertaken for the CHNP to date has indicated a strong desire for the Neighbourhood Plan to deliver new community infrastructure to serve the residents of the parish. This is in part to offset recent losses, and to also maintain and enhance the viability and vitality of the village into the future. In addition, there was a recognition of the need to increase housing choice in the village.
- 4.10 As such, there was a clear indication from consultation that appropriate growth in the village would be supported if it increased housing choice and enabled the delivery of new community facilities.

Assessment of available sites

- 4.11 To explore potential locations for development of this type, a Call for Sites was undertaken for the Neighbourhood Plan, accompanied by a number of consultation events. This was with a view to identifying potential sites in the vicinity of the village which may be available for allocation through the Neighbourhood Plan.

- 4.12 This process led to the identification of six potential sites.¹¹ These sites then underwent a Neighbourhood Plan site appraisal which considered the suitability, availability and deliverability of the sites.¹²
- 4.13 To support the consideration of the suitability of the sites for a potential allocation of these types in the Neighbourhood Plan, the SEA process undertook a separate assessment of the key environmental constraints and opportunities present at each of the six sites. This considered the potential effects that may arise as a result of delivering housing and community uses at these locations.
- 4.14 In this context the sites have been considered in relation to the SEA Framework of objectives and decision-making questions developed during SEA scoping (Chapter 3) and the baseline information. This SEA site assessment was carried out separately to the Neighbourhood Plan site appraisal.
- 4.15 The locations of the six sites assessed through the SEA process are presented in **Figure 4.2** below. The tables which follow present the assessment of the sites and provide an indication of each site's sustainability performance in relation to the eight SEA themes.

¹¹ Seven sites were initially identified. However, one of these sites (Site 6 – Clyst Honiton Parish Playing Fields) lies virtually wholly within the Exeter Airport Public Safety Zone (PSZ), as defined by the Department for Transport. The objective of PSZs is that there should be no increase in the number of people living, working or congregating in the PSZ and that, over time, the number should be reduced as circumstances allow (e.g. when any redevelopment takes place). As such the site was not appraised.

¹² AECOM (2017) Site Appraisal for the Clyst Honiton Neighbourhood Plan

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LEGEND

- Clyst Honiton Neighbourhood Plan Area
- Site Option
- SEA1: Land adjacent to Clyst Honiton Bypass
- SEA2: Land to the south west of Clystside
- SEA3: Land within the ownership boundary of Clyst House
- SEA4: Land occupied by SW Slating & Tiling Ltd, adjacent to Honiton Road
- SEA5: Glebe lands/allotments adjacent to Honiton Road
- SEA6: Briar House

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Purpose of Issue
DRAFT

Client
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Project Title
SEA OF THE CLYST HONITON NEIGHBOURHOOD PLAN

Drawing Title
SITES ASSESSED FOR THE SEA OF THE CLYST HONITON NEIGHBOURHOOD PLAN

Drawn CN	Checked JW	Approved CB	Date 23/09/2020
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AECOM
McLaren
Aercon Link, Basingstoke
Hampshire, RG24 7PP
Telephone: 01256 310200
Fax: 01256 310031
www.aecom.com

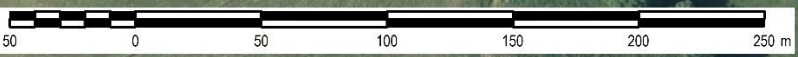


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FIGURE 4.2

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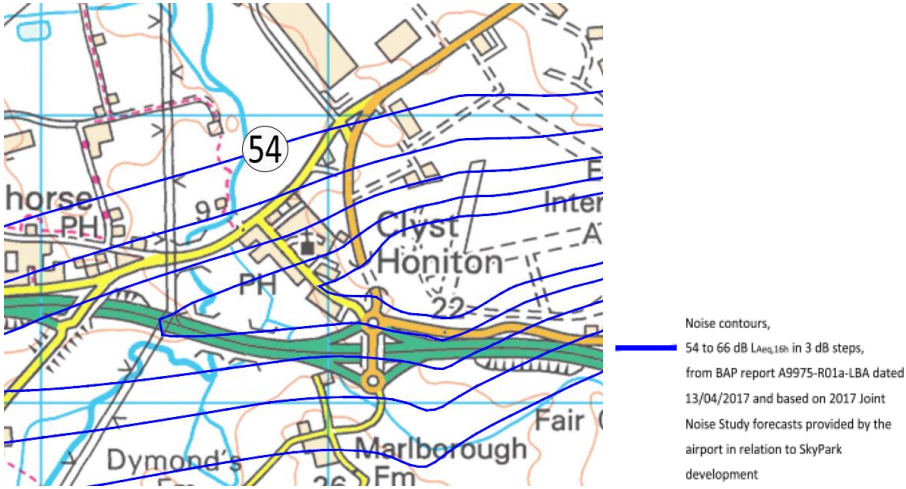


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SEA site assessment findings

Table 4.1: SEA1, Land adjacent to Clyst Honiton Bypass

SEA theme	Commentary, SEA1, Land adjacent to Clyst Honiton Bypass
Environmental Quality	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is located along major roads in Exeter, first declared by Exeter City Council in 2005, for exceedances of nitrogen dioxide (NO₂)¹³. The nearest EDDC air quality monitoring station to the Site is located at the junction of Little Orchard – Exeter Airport junction (N26)¹⁴, along the A30 and B3184, approximately 300m south of the site. In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³¹⁵ for NO₂.</p> <p>There are some noise issues on site. Key sources of noise include: general ambient noise from distant and local roads and in particular the Clyst Honiton Bypass; noise of aircraft operations at Exeter Airport, including both noise from airborne aircraft and noise from aircraft on the ground; noise from ground running of aircraft engines at the engine test facility; noise from the Skypark located to the east of the development site; and use of any freight/deliveries from the operation of DPD and Lidl delivery depot. Figure 4.3 sets out the anticipated 2030 daytime noise contours associated with Exeter Airport in the vicinity of the site.</p> 
<p>Figure 4.3: Aircraft Noise Contours 2030 Forecast Average Summer Daytime, based on 2017 Joint Noise Study¹⁶</p>	

¹³ Department for Environment Food & Rural Affairs (DEFRA) https://uk-air.defra.gov.uk/aqma/details?aqma_ref=290 - Accessed May 2020
¹⁴ East Devon District Council (2019) https://eastdevon.gov.uk/media/3418293/2019-east-devon-asr-2019_final.pdf
¹⁵ DEFRA <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> Accessed May 2020
¹⁶ Source: BAP (June 2020, with update in March 2023) Noise Assessment at Clyst Honiton Bypass Site

SEA theme	Commentary, SEA1, Land adjacent to Clyst Honiton Bypass
Biodiversity	<p>The site does not contain significant biodiversity constraints.</p> <p>No statutory or non-statutory designated sites were identified within 1km of the Site boundary. The Exe Estuary Special Protection Area SPA/ Ramsar / SSSI is located 5.6km to the south-west of the site and the East Devon Pebblebed Heaths SAC/ SPA/ SSSI is located 6.3km to the south-east of the site. Given its relative proximity for recreational uses, the site is located within these designated sites' recreational impact zones.</p> <p>Otherwise, the site is not within a specified SSSI Impact Risk Zone for the type of development that would potentially be taken forward.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves.</p> <p>Biodiversity habitats on the site are generally considered to be of limited value with hedgerows being of local value. A number of protected species may be present within or use the site, including bats and breeding birds</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is in relative proximity to the village centre and is accessible to local bus routes and cycle routes. This will help limit the need to use the private car to access services, facilities and employment opportunities (with benefits for limiting greenhouse gas emissions).</p> <p>In relation to adapting to the effects of climate change, the site is not located within identified flood risk zones for fluvial or surface water flooding.</p>
Landscape	<p>The site is not sensitive in landscape terms. It is bordered by the village to the west, and roads to the north, south and east. There is limited visibility of the site from neighbouring properties due to the established hedgerow and tree belt on the western boundary of the site. Additionally, grass verges and hedgerow along the eastern boundary of the site screen views of users from passing vehicles.</p>
Historic Environment	<p>No nationally listed buildings, registered parks and gardens, historic battlefields or scheduled monuments are present, adjacent or within the immediate setting of the site. There is a cluster of seven listed buildings and structures located within the churchyard of the Grade II* listed Church of St Michael, which is located approximately 100-200m to the south / south west of the site. The setting of these would unlikely to be affected though given existing residential dwellings, hedgerows and dense scrub screen the site from views. In addition, a Grade II listed Milestone at SX 987937 is located adjacent to Honiton Road. This is situated at sufficient distance from the site so that any visual intrusion from development at the site would be unlikely due to the intervening land use.</p> <p>There are seven features listed on the Devon Historic Environment Record (HER) located on the site. Five of these are associated with the site of the former RAF Exeter Airfield; in addition to the airfield, the records include the site of two WWII hangars, an intact but in poor condition Gunnery Research Unit Command Office, and the site of a Crew Duty Room. In addition, there are two further features listed on the HER, including boundary features and two groups of 'anomalies identified during a geophysical survey that could not be characterised but which may represent archaeological features'.</p>

SEA theme		Commentary, SEA1, Land adjacent to Clyst Honiton Bypass	
Land, Soil and Water Resources		<p>The fields in the north and south comprise unmanaged grassland, whilst the field in the middle has been returned to agricultural use from former brownfield land / hard standing.</p> <p>As the site is a greenfield location, development would not make the best use of previously developed land. Recent agricultural land classification has not been undertaken on the site. However, land to the north of Honiton Road and to the east of the village has been classified as Grade 2 agricultural land. This is land classified as 'the best and most versatile' agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community		<p>Allocation of the site would contribute positively towards meeting local housing needs. Given its size, this includes through significant potential to the deliver affordable housing. The size of the site also potentially lends itself well to the delivery of additional community infrastructure.</p> <p>The site is in relative proximity to the limited amenities available in the village centre and is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. This will support accessibility to services, facilities and employment opportunities.</p>	
Health and Wellbeing		<p>The site is accessible to walking and cycling routes and local Public Rights of Way networks.</p> <p>In common with other areas in Clyst Honiton village, the site is not readily accessible to medical services.</p>	
Transport		<p>The site is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. Access to local bus services is via the nearest bus stop located 350m away at York Terrace / Honiton Road via Waterslade Lane.</p>	
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.2: SEA2, Land to the south west of Clystside

SEA theme	Commentary, SEA2, Land to the south west of Clystside
Environmental Quality	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is located along major roads in Exeter, first declared by Exeter City Council in 2005, for exceedances of nitrogen dioxide (NO₂)¹⁷. The nearest EDDC air quality monitoring station to the Site is located at the junction of Little Orchard – Exeter Airport junction (N26)¹⁸, along the A30 and B3184. In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³¹⁹ for NO₂.</p> <p>No significant noise quality issues are present on the site.</p>
Biodiversity	<p>No statutory or non-statutory designated sites were identified within 1km of the Site boundary. The Exe Estuary Special Protection Area SPA/ Ramsar / SSSI is located 5.4km to the south-west of the site and the East Devon Pebblebed Heaths SAC/ SPA/ SSSI is located 6.1km to the south-east of the site. Given its relative proximity for recreational uses, the site is located within these designated sites' recreational impact zones.</p> <p>Otherwise, the site is not within a specified SSSI Impact Risk Zone for the type of development that would potentially be taken forward.</p> <p>The site has potential ecological value. This includes relating to presence of floodplain grazing marsh BAP Priority Habitat to the south west and west of the site (associated with the River Clyst), and a copse of trees to the east of the site. The site boundaries also benefit from relatively dense vegetation, including a mixture of semi-mature trees and hedgerows. These have the potential to be home to protected species.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is in excellent proximity to the village centre and is accessible to local bus routes and cycle routes. This will help limit the need to use the private car to access services, facilities and employment opportunities (with benefits for limiting greenhouse gas emissions).</p> <p>A significant part of the site lies within Flood Zone 3 (with a very small strip along the north east boundary in Flood Zone 2), which denotes a high probability (i.e. greater than 1 in 100 annual probability) of river flooding. National guidance states that 'only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required'²⁰. The south west part of the site is known to have flooded²¹. The site is however gently sloping from the north east to the south west. As such it is likely that the north eastern parts of the site have lower flood risk.</p>

¹⁷ Department for Environment Food & Rural Affairs (DEFRA) https://uk-air.defra.gov.uk/aqma/details?aqma_ref=290 - Accessed May 2020

¹⁸ East Devon District Council (2019) https://eastdevon.gov.uk/media/3418293/2019-east-devon-asr-2019_final.pdf

¹⁹ DEFRA <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> Accessed May 2020

²⁰ Department for Communities and Local Government, 2012; Technical Guidance to the National Planning Policy Framework.

²¹ Pell Frischmann, 2014; Clyst Honiton Pumping Station Flood Risk Assessment - Appendix C: Environment Agency Data.





SEA theme		Commentary, SEA2, Land to the south west of Clystside	
Landscape		Development at the site has the potential to impact on villagescape character. The site is overlooked by numerous residential properties within the village (approximately 15) which are raised above the site; these include properties on Clystside and St. Michaels Hill. In terms of impacts on wider landscape character, including with regards to longer distance views in from the south west, the site sits within the context of the existing village, which will limit impacts.	
Historic Environment		<p>No nationally listed buildings, registered parks and gardens, historic battlefields or scheduled monuments are present, adjacent or within the immediate setting of the site. There is a cluster of seven listed buildings and structures located within the churchyard of the Grade II* listed Church of St Michael, which is located approximately 60m to north east of the site. Whilst a number of properties are located between the site and the churchyard, the church is visible from the site. As such development at this location has the potential to affect the setting of the church.</p> <p>One feature listed on the Devon Historic Environment Record (HER) is located on the site. This comprises a series of orchard banks 'of probable post-medieval to modern date are visible as a series of linear earthwork banks'.</p>	
Land, Soil and Water Resources		<p>As the site is a greenfield location, development would not make the best use of previously developed land.</p> <p>Recent agricultural land classification has been undertaken on the site. This highlights that the land is Grade 3b agricultural land, which is defined as 'moderate' quality agricultural land. This land is not classified as 'the best and most versatile' agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community		<p>Allocation of the site would contribute positively towards meeting local housing needs. Given its size, this includes potentially through the delivery of affordable housing. The size of the site also lends itself to the delivery of new community infrastructure.</p> <p>The site is in immediate proximity to the limited amenities in the village centre and is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. This will support accessibility to services, facilities and employment opportunities.</p>	
Health and Wellbeing		<p>The site is accessible to walking and cycling routes and local Public Rights of Way networks.</p> <p>In common with other areas in Clyst Honiton village, the site is not readily accessible to medical services.</p>	
Transport		The site is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. Access to local bus services is via the nearest bus stop located 200m from the site on Honiton Road.	
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.3: SEA3, Land within the ownership boundary of Clyst House

SEA theme	Commentary, SEA3, Land within the ownership boundary of Clyst House
Environmental Quality	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is located along major roads in Exeter, first declared by Exeter City Council in 2005, for exceedances of nitrogen dioxide (NO₂)²². The nearest EDDC air quality monitoring station to the site is located at the junction of Little Orchard – Exeter Airport junction (N26)²³. In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³²⁴ for NO₂.</p> <p>No significant noise quality issues are present on the site.</p>
Biodiversity	<p>No statutory or non-statutory designated sites were identified within 1km of the Site boundary. The Exe Estuary Special Protection Area SPA/ Ramsar / SSSI is located 5.5km to the south-west of the site and the East Devon Pebblebed Heaths SAC/ SPA/ SSSI is located 6.2km to the south-east of the site. Given its relative proximity for recreational uses, the site is located within these designated sites' recreational impact zones.</p> <p>Otherwise, the site is not within a specified SSSI Impact Risk Zone for the type of development that would potentially be taken forward.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves. The site contains a limited number of features of biodiversity interest, including some mature trees.</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is in excellent proximity to the village centre and is accessible to local bus routes and cycle routes. This will help limit the need to use the private car to access services, facilities and employment opportunities (with benefits for limiting greenhouse gas emissions).</p> <p>The site lies within Flood Zone 1, which denotes a low probability (i.e. less than 1 in 1,000 annual probability) of river flooding. The site is at very low risk of flooding from surface water, which denotes a chance of flooding of less than 1 in 1,000 annual probability.</p>
Landscape	<p>Development of the site has significant potential to impact on villagescape character given it would result in the loss of open space (and potentially) mature trees within the grounds of Clyst House. Residential properties to the south (along Clystside) have short screened views of the site. A particular impact would be on historic villagescape character given the site is within the setting of key heritage assets in the village (discussed in more detail under the Historic Environment theme below).</p> <p>In terms of impacts on wider landscape character, including with regards to longer distance views, the site sits within the context of the existing village.</p>

²² Department for Environment Food & Rural Affairs (DEFRA) https://uk-air.defra.gov.uk/aqma/details?aqma_ref=290 - Accessed May 2020

²³ East Devon District Council (2019) https://eastdevon.gov.uk/media/3418293/2019-east-devon-asr-2019_final.pdf

²⁴ DEFRA <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> Accessed May 2020

SEA theme		Commentary, SEA3, Land within the ownership boundary of Clyst House	
Historic Environment		The site is located adjacent to the Grade II* listed St Michael and All Angels Church to the south east. In addition to the church, the churchyard contains six further Grade II listed structures. As such, any development on the site (which comprises open land important to the setting of the church) would have significant effects on the setting of the Grade II* listed church and associated Grade II structures without the careful design and layout of new development. Development of the site would also have significant impacts on the historic villagescape given the open perspective the site currently provides.	
Land, Soil and Water Resources		The site comprises the gardens of Clyst House, which is classified as previously developed land. The site is not located within a Groundwater Source Protection Zone.	
Population and Community		Allocation of the site would contribute positively towards meeting local housing needs. Given its size, this includes potentially through the delivery of affordable housing if the whole site were developed. The site is in immediate proximity to the limited amenities in the village centre and is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. This will support accessibility to services, facilities and employment opportunities.	
Health and Wellbeing		The site is accessible to walking and cycling routes and local Public Rights of Way networks. In common with other areas in Clyst Honiton village, the site is not readily accessible to medical services.	
Transport		The site is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. Access to local bus services is via the nearest bus stop located 210m from the site on Honiton Road.	
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.4: SEA4, Land occupied by SW Slating & Tiling Ltd, adjacent to Honiton Road

SEA theme	Commentary, SEA4, Land occupied by SW Slating & Tiling Ltd, adjacent to Honiton Road
Environmental Quality	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is located along major roads in Exeter, first declared by Exeter City Council in 2005, for exceedances of nitrogen dioxide (NO₂)²⁵. The nearest EDDC air quality monitoring station to the site is located at the junction of Little Orchard – Exeter Airport junction (N26)²⁶. In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³²⁷ for NO₂.</p> <p>The site is located adjacent to York Terrace / Honiton Road, where there is some traffic noise.</p>
Biodiversity	<p>The site does not contain significant biodiversity constraints.</p> <p>No statutory or non-statutory designated sites were identified within 1km of the Site boundary. The Exe Estuary Special Protection Area SPA/ Ramsar / SSSI is located 5.6km to the south-west of the site and the East Devon Pebblebed Heaths SAC/ SPA/ SSSI is located 6.3km to the south-east of the site. Given its relative proximity for recreational uses, the site is located within these designated sites' recreational impact zones.</p> <p>Otherwise, the site is not within a specified SSSI Impact Risk Zone for the type of development that would potentially be taken forward.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves.</p> <p>Given existing and recent uses, the site has limited biodiversity value.</p>

²⁵ Department for Environment Food & Rural Affairs (DEFRA) https://uk-air.defra.gov.uk/aqma/details?aqma_ref=290 - Accessed May 2020

²⁶ East Devon District Council (2019) https://eastdevon.gov.uk/media/3418293/2019-east-devon-asr-2019_final.pdf

²⁷ DEFRA <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> Accessed May 2020

SEA theme	Commentary, SEA4, Land occupied by SW Slating & Tiling Ltd, adjacent to Honiton Road
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is in good proximity to the village centre and has excellent access to local bus routes and cycle routes. This will help limit the need to use the private car to access services, facilities and employment opportunities (with benefits for limiting greenhouse gas emissions).</p> <p>Whilst the site lies predominantly within Flood Zone 1, which denotes a low probability (i.e. less than 1 in 1,000 annual probability) of river flooding, about a third of the site is located within Flood Zone 3. National guidance suggests that development should take place 'only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required'²⁸. If progressed, it will be important that vulnerable development is located away from this part of the site and that suitable flood risk mitigation is provided. Such mitigation should also seek to maximise opportunities for nature-based solutions that deliver benefits more widely, including for biodiversity, ecology, and habitats. The adjoining land associated with Honiton Road and land to the west is also within Flood Zone 2 and 3.</p> <p>The site is at very low risk of flooding from surface water, which denotes a chance of flooding of less than 1 in 1,000 annual probability; while Honiton Road and land to the west is at a medium to low risk of surface water flooding. Due to the flood risk present locally (but outside of the site), development at this location would need to ensure it does not increase the risk of flooding.</p>
Landscape	<p>The site comprises a previously developed employment site. Development of the site is therefore unlikely to have significant impacts on landscape character.</p>
Historic Environment	<p>No nationally listed buildings, registered parks and gardens, historic battlefields or scheduled monuments are present, adjacent or within the setting of the site. The site does not contain any features listed on the Devon HER. Whilst Honiton Road broadly follows the line of the line of the Roman road between Exeter and Honiton (which is listed on the HER), development on the site is unlikely to affect the archaeological potential of this route.</p>
Land, Soil and Water Resources	<p>The site comprises previously developed land. The development of the site would therefore support the efficient use of land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>
Population and Community	<p>Allocation of the site would contribute positively towards meeting local housing needs, although the size of the site reduces opportunities for the delivery of affordable housing.</p> <p>The site is in immediate proximity to the limited amenities in the village centre and local bus routes and cycle routes linking with Exeter and Cranbrook. This will support accessibility to services, facilities and employment opportunities.</p>

²⁸ Department for Communities and Local Government, 2012; Technical Guidance to the National Planning Policy Framework.

SEA theme		Commentary, SEA4, Land occupied by SW Slating & Tiling Ltd, adjacent to Honiton Road	
Health and Wellbeing		The site is readily accessible to walking and cycling routes (including cycle links along Honiton Road) and local Public Rights of Way networks. In common with other areas in Clyst Honiton village, the site is not readily accessible to medical services.	
Transport		The site is readily accessible to the walking and cycling routes located along York Terrace / Honiton Road. Access to local bus services is via the nearest bus stop located 80m from the site on York Terrace.	
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.5: SEA5, Glebe lands/allotments adjacent to Honiton Road

SEA theme	Commentary, SEA5, Glebe lands/allotments adjacent to Honiton Road
Environmental Quality	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is located along major roads in Exeter, first declared by Exeter City Council in 2005, for exceedances of nitrogen dioxide (NO₂)²⁹. The nearest EDDC air quality monitoring station to the site is located at the junction of Little Orchard – Exeter Airport junction (N26)³⁰. In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³³¹ for NO₂.</p> <p>The site is located adjacent to York Terrace / Honiton Road, where there is some traffic noise.</p>
Biodiversity	<p>No statutory or non-statutory designated sites were identified within 1km of the Site boundary. The Exe Estuary Special Protection Area SPA/ Ramsar / SSSI is located 5.6km to the south-west of the site and the East Devon Pebblebed Heaths SAC/ SPA/ SSSI is located 6.3km to the south-east of the site. Given its relative proximity for recreational uses, the site is located within these designated sites' recreational impact zones.</p> <p>Otherwise, the site is not within a specified SSSI Impact Risk Zone for the type of development that would potentially be taken forward.</p> <p>There are no BAP Priority Habitats on or in the vicinity of the site, or County Wildlife Sites or Local Nature Reserves.</p> <p>Given the site has been used for allotments for over 20 years, the site has some biodiversity value. The boundary of the site also comprises hedges on the north west and south east boundaries of the site alongside Honiton Road and Ship Lane, which further increases the ecological value of the site</p>
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is in good proximity to the village centre and has excellent access to local bus routes and cycle routes. This will help limit the need to use the private car to access services, facilities and employment opportunities (with benefits for limiting greenhouse gas emissions).</p> <p>Whilst the site lies within Flood Zone 1, which denotes a low probability (i.e. less than 1 in 1,000 annual probability) of river flooding, adjoining land associated with Honiton Road and land to the west is within Flood Zone 2 and 3. The site is at very low risk of flooding from surface water, which denotes a chance of flooding of less than 1 in 1,000 annual probability; while Honiton Road and land to the west is at a medium to low risk of surface water flooding. Due to the flood risk present locally (but not on the site), development at this location would need to ensure it does not increase the risk of flooding.</p>

²⁹ Department for Environment Food & Rural Affairs (DEFRA) https://uk-air.defra.gov.uk/aqma/details?aqma_ref=290 - Accessed May 2020

³⁰ East Devon District Council (2019) https://eastdevon.gov.uk/media/3418293/2019-east-devon-asr-2019_final.pdf

³¹ DEFRA <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> Accessed May 2020

SEA theme		Commentary, SEA5, Glebe lands/allotments adjacent to Honiton Road	
Landscape	The site comprises well established allotments at the edge of the built-up part of the village. Development of the site therefore has the potential to have impacts on views into the village from York Terrace/Honiton Road and neighbouring properties. However, impacts on wider landscape character are likely to be minimal given the small size of the site and existing screening to the north west.		
Historic Environment	No nationally listed buildings, registered parks and gardens, historic battlefields or scheduled monuments are present, adjacent or within the setting of the site. The site does not contain any features listed on the Devon HER. Whilst Honiton Road broadly follows the line of the Roman road between Exeter and Honiton (which is listed on the HER), development on the site is unlikely to affect the archaeological potential of this route.		
Land, Soil and Water Resources	The site comprises allotment land, which has been established as such for over 20 years. Development of this site would therefore lead to the loss of productive land. The site is not located within a Groundwater Source Protection Zone.		
Population and Community	Allocation of the site would contribute positively towards meeting local housing needs, although the size of the site reduces opportunities for the delivery of affordable housing. Development of the site would lead to the loss of the well-established allotments present on the site, which are an important community resource for the village. The site is in immediate proximity to the limited amenities in the village centre and local bus routes and cycle routes linking with Exeter and Cranbrook. This will support accessibility to services, facilities and employment opportunities.		
Health and Wellbeing	The site is accessible to walking and cycling routes (including cycle links along Honiton Road) and local Public Rights of Way networks. In common with other areas in Clyst Honiton village, the site is not readily accessible to medical facilities. The loss of the allotments for development has the potential to affect health and wellbeing for users.		
Transport	The site is readily accessible to the walking and cycling routes located along York Terrace / Honiton Road. Access to local bus services is via the nearest bus stop located 25m from the site on York Terrace.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.6: SEA6, Briar House

SEA theme	Commentary, SEA6, Briar House
Environmental Quality	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is located along major roads in Exeter, first declared by Exeter City Council in 2005, for exceedances of nitrogen dioxide (NO₂)³². The nearest EDDC air quality monitoring station to the Site is located at the junction of Little Orchard – Exeter Airport junction (N26)³³, along the A30 and B3184. In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³³⁴ for NO₂.</p> <p>No significant noise quality issues are present on the site.</p>
Biodiversity	<p>No statutory or non-statutory designated sites were identified within 1km of the Site boundary. The Exe Estuary Special Protection Area SPA/ Ramsar / SSSI is located 5.4km to the south-west of the Site and the East Devon Pebblebed Heaths SAC/ SPA/ SSSI is located 6.1km to the south-east of the site. Given its relative proximity for recreational uses, the site is located within these designated sites' recreational impact zones.</p> <p>Otherwise, the site is not within a specified SSSI Impact Risk Zone for the type of development that would potentially be taken forward.</p> <p>The site has potential for ecological value. This includes relating to presence of floodplain grazing marsh BAP Priority Habitat to the south west and west of the site (associated with the River Clyst), and a copse of trees to the north west of the site. The site boundaries also benefit from relatively dense vegetation, including a mixture of semi-mature trees and hedgerows. These have the potential to be home to protected species.</p>

³² Department for Environment Food & Rural Affairs (DEFRA) https://uk-air.defra.gov.uk/aqma/details?aqma_ref=290 - Accessed May 2020

³³ East Devon District Council (2019) https://eastdevon.gov.uk/media/3418293/2019-east-devon-asr-2019_final.pdf

³⁴ DEFRA <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits> Accessed May 2020

SEA theme	Commentary, SEA6, Briar House	
Climate Change	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the village and an intensification of uses at this location, although these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is in good proximity to the village centre and has excellent access to local bus routes and cycle routes. This will help limit the need to use the private car to access services, facilities and employment opportunities (with benefits for limiting greenhouse gas emissions).</p> <p>A significant part of the site lies within Flood Zone 3 (with a very small strip along the north east boundary in Flood Zone 2), which denotes a high probability (i.e. greater than 1 in 100 annual probability) of river flooding. National guidance suggests that development should take place 'only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required'³⁵. The north eastern part of the site (comprising the existing house and garden) are however stepped up from the lower part of the site. As such it is likely that the north eastern part of the site has lower flood risk.</p> <p>The site also lies in an area of low risk of flood from surface water, which denotes a chance of flooding from surface water of between 1 in 1,000 (0.1%) and 1 in 100 (1%) annual probability.</p>	
Landscape	<p>The site is relatively screened from neighbouring properties and from the wider landscape by existing vegetation and topography.</p>	
Historic Environment	<p>No nationally listed buildings, registered parks and gardens, historic battlefields or scheduled monuments are present, adjacent or within the setting of the site.</p> <p>One feature listed on the Devon Historic Environment Record (HER) is located on the site. This comprises a series of orchard banks 'of probable post-medieval to modern date are visible as a series of linear earthwork banks'.</p>	
Land, Soil and Water Resources	<p>The comprises brownfield and garden land site. As such it is classified as previously developed land.</p> <p>Recent agricultural land classification has been undertaken in the vicinity of the site. This highlights that the land is Grade 3b agricultural land, which is defined as 'moderate' quality agricultural land. This land is not classified as 'the best and most versatile' agricultural land.</p> <p>The site is not located within a Groundwater Source Protection Zone.</p>	
Population and Community	<p>Allocation of the site would contribute positively towards meeting local housing needs. Given its size, this includes potentially through the delivery of affordable housing.</p> <p>The site is in immediate proximity to the limited amenities in the village centre and is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. This will support accessibility to services, facilities and employment opportunities.</p>	

³⁵ Department for Communities and Local Government, 2012; Technical Guidance to the National Planning Policy Framework.

SEA theme		Commentary, SEA6, Briar House	
Health and Wellbeing	The site is accessible to walking and cycling routes and local Public Rights of Way networks. In common with other areas in Clyst Honiton village, the site is not readily accessible to medical services.		
Transport	The site is accessible to local bus routes and cycle routes linking with Exeter and Cranbrook. Access to local bus services is via the nearest bus stop located 150m from the site on Honiton Road.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.7: Summary of SEA site assessment findings

Site	Env. Quality	Bio-diversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population	Health and Wellbeing	Transport
SEA1									
SEA2									
SEA3									
SEA4									
SEA5									
SEA6									
Key									
Likely adverse effect (without mitigation measures)						Likely positive effect			
Neutral/no effect						Uncertain effect			

Preferred approach of the Neighbourhood Plan in light of appraisal findings

Choice of site allocations taken forward for the Regulation 14 draft Neighbourhood Plan

- 4.16 Site SEA6 (Briar House) was rejected following appraisal given a lack of community support for the site which is constrained by fluvial flood risk. Sites SEA2 was similarly rejected due to flood risk constraints. Site SEA3 was rejected given significant landscape and historic environment constraints.
- 4.17 The Regulation 14 version of the Neighbourhood Plan allocated three sites for up to 64 homes.
- 4.18 The key allocation proposed by the Regulation 14 version of the Neighbourhood Plan was a mixed-use development taken forward on the site adjacent to the Clyst Honiton Bypass. This would comprise up to 49 residential units, up to 2,400 m² of employment

floor space and a multi-use community facility. The site allocation is being progressed through a Neighbourhood Development Order, which has been developed in parallel with the Neighbourhood Plan.

4.19 The Regulation 14 version of the Neighbourhood Plan stated the following reasons for the allocation:

“Policy SA3 seeks the development of a mixed-use site (Figure 43) to enable the delivery of a new community building which is the key driver underpinning the production of the Clyst Honiton Neighbourhood Plan. A site Masterplan (Figure 44) includes details on the scheme.”

4.20 In addition, the Regulation 14 draft Neighbourhood Plan allocated two further sites for housing:

- Slating and Tiling Site, York Terrace: Up to nine 1 and 2 bedroom dwellings fronting on to York Terrace; and
- Existing allotment site, York Terrace: Six dwellings fronting on to York Terrace, comprising 1 and 2 bed units, suitable for both young people and those wanting to downsize. This is subject to an alternative allotment site being identified.

4.21 The stated reasons for these allocations in the Regulation 14 draft version of the Neighbourhood Plan were as follows:

“Policy SA1 seeks the provision of small properties close to existing village amenities suitable for occupation by older people who are seeking to downsize from their existing property and by those starting on the property ladder who wish to remain within the community.”

and

4.22 *“Policy SA2 seeks the provision of small properties close to existing village amenities suitable for the occupation of older people wanting to downsize from their existing property and those starting on the property ladder who wish to remain within the community.”*

Assessments of earlier versions of the Neighbourhood Plan

4.23 An appraisal of an early version of the draft Neighbourhood Plan was presented in the Environmental Report accompanying an earlier Regulation 14 consultation undertaken in late 2020.³⁶

4.24 Subsequent to this, in March 2023 AECOM assessed the revised Pre-Submission Regulation 14 draft of the Neighbourhood Plan, including policies and individual sites, as identified above. This assessment is presented in the Environmental Report accompanying Regulation 14 consultation.³⁷

4.25 After Regulation 14, responses to the CHNP from the community, statutory authorities and a Plan Health check undertaken by Intelligent Plans and Examinations (IPE) were processed by the Steering Group which resulted in extensive changes to the Draft Plan and appendices.

4.26 It was also agreed that the CHNP would be submitted ahead of the Clyst Honiton Neighbourhood Development Order (NDO), which required further technical work.

³⁶ AECOM (September 2020) SEA Environmental Report to accompany the Regulation 14 'Pre-submission' version of the Clyst Honiton Neighbourhood Plan

³⁷ AECOM (March 2023) SEA Environmental Report to accompany the Regulation 14 'Pre-submission' version of the Clyst Honiton Neighbourhood Plan

- 4.27 A number of policies were deleted from the NP, while others were amalgamated. The most noteworthy changes related to the deletion of housing site allocation policies. This is discussed further below.

Choice of site allocations taken forward for the Regulation 16 submission version of the Neighbourhood Plan

- 4.28 Post Regulation 14 'the Allotment site' and 'Clyst Honiton Bypass Site' allocations were withdrawn from the Neighbourhood Plan. The following reasons for this have been provided by the Steering Group:
- 4.29 **The Allotment Site:** In the Site Consultation event, the present allotment site being used to provide housing was not well received, which was not unexpected, because having lost so many of their community assets the residents did not wish to lose the allotments as well. At the time of this consultation the provision of alternative allotments could not be promised to the locals as it had not been finalised by the landowner. After the consultation alternative allotments were provided and it was agreed to put the Allotment Site out to Regulation 14 consultation. At Regulation 14 advice from Exeter and Devon Airport Authority Limited notified the Steering Group that the alternative allotments crossed the Public Safety R Zone, where land for allotment use is unacceptable from a safety perspective. This resulted in the Allotment Site and the proposed alternative allotment space being deleted from the Neighbourhood Plan as development of the Allotment Site was dependent on the alternative space coming forward.
- 4.30 **Clyst Honiton Bypass Site:** This site was withdrawn from the Neighbourhood Plan on feedback received at Regulation 14 which advised the Steering Group that delivery of the site was best delivered through the Clyst Honiton Neighbourhood Development Order (NDO). The feedback received led to the Steering Group agreeing that allocating the site in the Neighbourhood Plan would undermine the NDO and would endanger the delivery of the much-needed community building. This was because within the Neighbourhood Plan the Clyst Honiton Bypass Site offered an alternative planning approach which provided less security for the delivery of a community building, housing, and economic units.
- 4.31 In response to this, the submission (Regulation 16) Neighbourhood Plan brings forward one housing site (Slate and Tile Site) for up to nine houses. This site is not free from constraint as it is located partially within the fluvial floodplain. As such there is a need to consider sequential testing requirements. It is recognised that the only alternative site (located outside of the fluvial floodplain) at this stage would be Site SEA3 (Land within the ownership boundary of Clyst House). This site has been rejected due to significant historic environment and landscape setting impacts that would be very difficult to overcome/ mitigate. In progressing the Slate and Tile Site there is an opportunity to apply sequential testing on-site and avoid vulnerable development within areas of higher flood risk and deliver flood risk mitigation that could reduce the significance of effects and increase long-term resilience.
- 4.32 The community's desire for houses to provide a free community building will be delivered through the Clyst Honiton NDO, support for which is provided through the new Policy C2 (New community building). The site is no longer allocated in the plan and the NDO is being progressed as discrete and separate documents. The new Policy E3 further seeks to facilitate the NDO by allowing for appropriate business development at the settlement edge.

Neighbourhood Plan policies

- 4.33 To support the implementation of the vision and objectives for the CHNP discussed in Section 2.5, the current 'submission' Regulation 16 version of the Neighbourhood Plan

puts forward 23 policies to guide development in the neighbourhood area. These were developed following extensive community consultation and evidence gathering. Previous iterations of this policy framework have been assessed through the SEA, as set out above in Section 4.22 – 4.23.

4.34 The policies presented in the current, submission, version of the Neighbourhood Plan are tabulated below.

Table 4.8: Clyst Honiton Neighbourhood Plan policies

Policies

Policy C1	Community facilities and services
Policy C2	New community building
Policy C3	Additional new community facilities and services
Policy DS1	Development of high-quality design
Policy DS2	Sustainable design and construction of buildings
Policy DS3	Communications infrastructure
Policy DS4	Sustainable drainage
Policy DS5	Flood risk management
Policy DS6	Storage spaces
Policy DS7	Provision of charging points
Policy DS8	Provision and use of renewable energy
Policy DS9	Community Led Renewable Energy Production
Policy E1	Supporting a rural economy
Policy E2	Rural economy: live-work units
Policy E3	Opportunities for new and/or improved business development in Zone A
Policy SA1	Slate and Tile Site
Policy H1	Self-build and custom build houses
Policy NE1	Landscape and biodiversity
Policy NE2	Green Landscaped Corridor
Policy NE3	River Clyst Park
Policy NE4	Local Green Spaces
Policy AC1	Parking provision
Policy AC2	Public realm improvements to Clyst Honiton village road and its road junctions
Policy AC3	Active Travel Provision

4.35 The next chapter presents the findings of the assessment of these policies.

5. What are the findings at this current stage?

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current (November 2023) Regulation 16 version of the CHNP. This chapter presents:
- An appraisal of the current version of the Neighbourhood Plan under the nine SEA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Approach to this appraisal

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

Environmental Quality

- 5.5 The site allocation taken forward through the current version of the Neighbourhood Plan is not located in an area with significant air quality issues. In this respect the nearest AQMA to the neighbourhood area is located along major roads in Exeter for exceedances of nitrogen dioxide (NO₂). The nearest EDDC air quality monitoring station to the site is located at the junction of Little Orchard – Exeter Airport junction (N26). In 2018, this monitoring station reported annual mean concentrations of 19.5 µg/m³ from NO₂ monthly diffusion tube testing, which is well below the annual mean national air quality objective and European Directive limit and target values of 40µg/m³ for NO₂.
- 5.6 Noise pollution is however a more significant issue for parts of the neighbourhood area. With regards to the CHNP housing site allocation, while not particularly constrained, it is recognised that key sources of noise within the wider Neighbourhood Area include: general ambient noise from distant and local roads and in particular the Clyst Honiton Bypass; noise of aircraft operations at Exeter Airport, including both noise from airborne aircraft and noise from aircraft on the ground; noise from ground running of aircraft engines at the engine test facility; noise from the Skypark located to the east of the development site; and use of any freight/deliveries from the operation of DPD and Lidl delivery depot.

- 5.7 The policy for the allocation (Policy SA1) recognises potential noise quality issues and sets out provisions relating to limiting noise pollution. In this context the policy seeks to equip residential units with glazing and adequate ventilation mechanisms and/ or measures that satisfactorily mitigate noise impacts from Exeter Airport and the road. Policy SA1 also seeks to introduce property boundaries that help to protect properties from the effects of noise, dust and other disturbance from the pavement and highway.
- 5.8 A number of the other CHNP policies also seek to limit the effects of noise pollution. For example, Policy DS2 (Sustainable design and construction of buildings) seeks to implement appropriate sustainable design and construction measures within new development in order to minimise the potential noise effect resulting from the proximity to Exeter Airport and the nearby road network. Noise quality will be further indirectly supported by the remaining design policies, which support energy efficiency and the high-quality design of development, and the policies which seek to enhance green infrastructure networks in the neighbourhood area (discussed in more detail below). The provision of a green landscape corridor to the southwest of the village through Policy NE2 will also help mitigate the impacts of noise pollution from the A30 on the village.

Biodiversity and Geodiversity

- 5.9 With regards to the allocation at the Slate and Tile site, given existing and recent uses, the site has limited biodiversity value. Given its relative proximity for recreational uses, the site allocation is located within the Exe Estuary Special Protection Area SPA/ Ramsar and East Devon Pebblebed Heaths SAC/SPA recreational impact zones. The Habitats Regulations Assessment (HRA) undertaken to support the Neighbourhood Plan
- 5.10 HRA has also been undertaken to evaluate how the Neighbourhood Plan will impact on internationally designated wildlife sites. This assessment undertook both Screening and Appropriate Assessment of the policies and any allocations within the Clyst Honiton Neighbourhood Plan. The international designated sites considered within the Appropriate Assessment for impact pathways that could not be screened out at the screening stage were:
- Exe Estuary Ramsar site
 - Exe Estuary SPA
 - East Devon Pebblebed Heaths SAC
 - East Devon Heaths SPA
 - Dawlish Warren Heath SAC
- 5.11 Impact pathways considered during the screening were: recreational pressure, water quality, water quantity, level and flow and air pollution. Water quality, water quantity, level and flow and air pollution were screened out at the Screening stage due to a lack of linking impact pathways. Recreational pressure could not be screened out at the Screening stage and was therefore further discussed within the Appropriate Assessment.
- 5.12 This was undertaken due to the proximity of two sites to the Plan area: the Exe Estuary Special Protection Area SPA/ Ramsar and East Devon Pebblebed Heaths SAC/SPA.
- 5.13 Following Appropriate Assessment (AA), it was concluded that, combined with the overarching East Devon Local Plan, the Clyst Honiton Neighbourhood Plan contains

sufficient policy mitigation to ensure no adverse effects on the integrity of international designated site will occur in isolation or in combination with other projects and plans.

- 5.14 Otherwise, the site allocation is not located within specified SSSI Impact Risk Zones (IRZs) for the type of development proposed.
- 5.15 Whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to future development in the neighbourhood area to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest and 2) support the resilience of ecological networks.
- 5.16 A key policy in this regard is Policy NE1 (Landscape and biodiversity). This sets out a range of provisions which will support habitats and species, including supporting the creation of new habitats, retaining and enhancing existing wildlife corridors, creating new wildlife corridors and encouraging the introduction of artificial nesting and roosting sites, such as bird boxes, insect bricks and bat boxes. The policy also seeks to retain existing landscape features of importance for biodiversity, including hedgerows, trees, watercourses and ponds, and where their loss cannot be avoided ensure replacements are of equal merit. It also seeks to ensure native species are used in landscape and boundary treatments. This will be further supported by Policy DS1 (Development of high-quality design), which seeks to ensure that within new development areas, mature or important trees are retained, other existing green and natural features such as hedgerows, and wildflower verges are integrated and native planting is used for green corridors and hedgerows.
- 5.17 Biodiversity in Clyst Honiton will also be supported by the green and blue infrastructure policies of the Neighbourhood Plan. This includes Policy NE4 (Local Green Community Spaces) which designates five areas of open space as Local Green Space, and Policy NE2 (Green Landscaped Corridor), which seeks to implement a Green Landscape Corridor to the southwest of the village, in part to ensure the continued functioning of the habitats at this location as an important biodiversity corridor.
- 5.18 Linked to green and blue infrastructure provision, the Neighbourhood Plan also recognises the value of biodiversity in helping to sustainably manage flood risk. In this context Policy DS4 (Sustainable drainage) supports the implementation of sustainable drainage systems (SuDS) which incorporate features of potential biodiversity value, including green roofs and retention ponds, and delivers biodiversity and habitat creation, and Policy DS5 (Flood risk management) supports flood risk management proposals which mitigate against damage to the river environment.
- 5.19 Published in July 2021, paragraph 174 (d) within the revised NPPF³⁸ states that planning policies and decisions should contribute to and enhance the natural and local environment by ‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks’, with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government’s 25-Year Environment Plan³⁹ (which was published in January 2018) and the Environment Act⁴⁰ (which received Royal Assent in November 2021). These national provisions are further supported by the policies of the Neighbourhood Plan, including Policy NE1 (Landscape and Biodiversity), which sets out proposals which seek to ensure that development secures a minimum of a 10% net gain (unless exceeded by local or national policy) for

³⁸ DLUHC (2018): ‘Revised National Planning Policy Framework’, [online] available to access via [this link](#)

³⁹ DEFRA (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via [this link](#)

⁴⁰ GOV.UK (2021): ‘Environment Act’, [online] available to access via [this link](#)

biodiversity, and a requirement that developers use the Defra biodiversity net gain tool to calculate the impact of their proposals.

- 5.20 As such, the Neighbourhood Plan effectively supports national and Local Plan policy provisions with regards to biodiversity through seeking to protect and enhance habitats, species, and ecological networks in Clyst Honiton. The provision of these policies will therefore help ensure that ecological sensitivities are appropriately considered during the planning, construction and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

Climate Change

- 5.21 In terms of climate change contribution, per capita greenhouse gas emissions generated in the neighbourhood area may continue to decrease with the wider adoption of energy efficiency measures, renewable energy production and new technologies. Transport emissions may also be limited by take up of electric cars. However, increases in the built footprint of Clyst Honiton would contribute to increases in the absolute levels of greenhouse gas emissions.
- 5.22 Whilst the delivery of approximately nine homes, employment land and community uses through the Neighbourhood Plan will increase greenhouse gas emissions either directly through construction, or indirectly through an increase in population and economic activities, the built footprint of the area and associated travel and consumption behaviours, this level of housing would likely be mirrored, or exceeded, by the approval of planning applications. As such the level of development proposed through the CHNP will be unlikely to lead to significant increases in greenhouse gas emissions over and above that would be seen otherwise.
- 5.23 The Neighbourhood Plan will help limit per capita greenhouse gas emissions through seeking to focus new development in close proximity to Clyst Honiton village centre. In this respect the location of the Neighbourhood Plan housing site allocation (Slate and Tile site) is accessible to the (limited) services and facilities in the village and public transport and cycle links available along Honiton Road. This will help reduce the need for residents to travel by car for many day-to-day facilities and reduce car dependency, helping to limit emissions from road transport. This will be supported by a number of the CHNP policies seeking to explicitly encourage walking and cycling through enhanced pedestrian and cycle provision, and an improved public realm. This is discussed in more detail under the 'Transportation' SEA theme below.
- 5.24 A limitation of emissions from transport will be further supported by the Neighbourhood Plan's facilitation of electric charging points for private vehicles. This includes through Policy DS7 (Provision of charging points), which highlights that all new housing, employment, commercial, leisure and retail developments proposals which provide parking are required to provide appropriately located charging points for electric or low emission vehicles and bicycles. In addition, all new employment, commercial, leisure and retail developments are required through the policy to provide vehicular electric charging points for staff and / or customers.
- 5.25 This will be further supported by Policy DS6 (Storage Spaces), which states that residential developments should be accompanied by appropriate storage space with charging points.
- 5.26 The Neighbourhood Plan policies however have a strong focus on delivering high quality, energy efficient development, alongside facilitating opportunities for renewable energy provision. Policy DS2 (Sustainable design and construction of buildings) highlights that the design and standard of any new development and any retrofit of existing development, including conversion and extensions *"should aim to meet a high*

level of sustainable design and construction and for energy efficiency to deliver the latest zero-carbon emissions target.” The supporting policy text then sets out examples of ways in which sustainable design and construction can be achieved, including through encouraging renewable energy installations on new and existing buildings. Similarly, Policy DS8 (Provision of renewable energy) highlights that new development shall aim to meet a high level of sustainable design and be optimised for renewable energy to comply with zero-carbon emissions. Specifically, support is set out for the retrofit of significant heritage assets to reduce energy demand and to generate renewable energy, and refurbishment and extension to maximise contribution to the energy efficiency of a building.

- 5.27 Policy DS9 is also noteworthy in this respect, supporting the development of sustainable community scale renewable energy systems in the plan area (where relevant criteria is met).
- 5.28 In terms of climate change adaptation, the Slate and Tile allocation site is located partially within Flood Risk Zone 3 and there will be a need to avoid locating vulnerable development within areas of higher flood risk onsite. The site allocation policy (Policy SA1) identifies the need for a detailed flood risk assessment onsite and incorporation of mitigation measures having appropriate regard to the proximity of the River Clyst. It is recommended that this policy further identifies a preference for nature-based solutions where possible, recognising that these deliver wide climate mitigation and adaptation benefits. Two of the three employment sites promoted for development under Policy E3 are also subject to flood risk constraints – particularly the Exeter Inn Car Park site, and a small part of the Old School Business Park. However, it is recognised that these are identified brownfield redevelopment opportunities and, particularly considering the current car park use at the Exeter Inn site, development provides an opportunity to improve drainage and flood management approaches on site to ultimately reduce flood risk in this area. Policy E3 appropriately identifies the need for detailed assessment of flood risk and mitigation in development proposals.
- 5.29 The CHNP has a close recognition of the flood risk issues present locally in the parish, including linked to the presence of the River Clyst, and surface water flooding issues. Key policies in this regard are policies DS4 and DS5. Policy DS5 supports proposals for new flood risk management schemes that will help to improve river water quality and management, and Policy DS4 (Sustainable drainage) sets out a range of provisions for managing surface water run-off and initiating sustainable approaches to drainage in both new and existing development areas. These provisions recognise the wider issues in the parish relating to flood risk and will help increase the resilience of Clyst Honiton to the likely effects of climate change.
- 5.30 As highlighted by the NPPF, well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). In addition, green infrastructure provision can support climate change mitigation through enhancing natural features which act as carbon sequestrators. Enabling and providing for green infrastructure within Clyst Honiton is therefore a key way in which the Neighbourhood Plan can help to promote climate change adaptation and mitigation measures. Responding to this, Policy NE1-NE4 set out a range of approaches which will enhance green infrastructure networks in the parish. This includes the protection and enhancement of existing green spaces (including through the delivery of a number of Local Green Spaces), the provision of a Green Landscaped Corridor to the southwest of the village, and through the implementation of a range of provisions for protecting and enhancing key landscape features in the landscape that will support both climate change mitigation and adaptation. These provisions will be further supported by Policy DS1 (Development of high-quality design), which seeks to implement *“climate resilient planted frontages and gardens to maximise removing carbon dioxide from the air, storing carbon in the plants and soil, and releasing oxygen into the atmosphere.”*

- 5.31 In light of the above, the CHNP sets out a range of provisions which will support positive gains with regard to climate change mitigation and adaptation measures within the neighbourhood area.

Landscape

- 5.32 The site allocation proposed through the CHNP is not considered to be in a location sensitive for landscape character. The Slating and Tiling site comprises a previously developed employment site, bounded by York Terrace. Development of the site is therefore unlikely to have significant impacts on landscape character. Whilst impacts on landscape character from the allocation is likely to be limited, Policy SA1 nonetheless sets out a range of provisions for delivering high quality design which will support local character, distinctiveness and a sense of place.
- 5.33 More broadly, landscape sensitivities in the parish are closely recognised by the Neighbourhood Plan policies, which have a strong focus on protecting and enhancing landscape and villagescape character. In this respect Policy DS1 (Development of high-quality design) sets out a range of provisions for reinforcing local character, including through the use of appropriate design, materials and boundary treatments, the retention of trees, hedgerows and other green and natural features, limiting the visual impact of parking, and enhancing the setting of designated and non-designated heritage assets. The policy also seeks to ensure that proposals have regard to the Clyst Honiton Village Character Assessment (2015), which, given it sets out the unique qualities and key features that define the character of Clyst Honiton, is an appropriate mechanism for supporting local distinctiveness and a sense of place.
- 5.34 A further key policy in this regard is Policy NE1 (Landscape and biodiversity) which sets out a range of provisions which will support landscape and villagescape character. This includes through seeking that new development proposals retain and integrate existing landscape features including hedgerows, trees, watercourses, and ponds, and use locally distinct landscaping and boundary treatments, including native species and local materials. It also seeks to ensure new development proposals respond positively to the surrounding landscape setting, through sensitive design, siting and landscaping. Furthermore, the policy seeks to ensure that new development proposals utilise East Devon's 'Landscape Character Assessment and Management Guidelines for East Devon' (2008) and that all major development proposals provide details of a landscaping scheme. This will demonstrate how the scheme responds to landscape character considerations.
- 5.35 The policies which seek to enhance Clyst Honiton's green infrastructure networks will also support landscape character. These include Policies NE1-NE4, which facilitate the protection and enhancement of existing green spaces (including through the delivery of a number Local Green Spaces) and through the implementation of a range of provisions for protecting and enhancing key features in the landscape. The provision of a Green Landscaped Corridor to the southwest of the village will also help protect the setting of the village, support local character and distinctiveness, and help mitigate the impacts of noise pollution from the A30 on the village.
- 5.36 A number of the other CHNP policies also seek to ensure that certain development types reflect local landscape character and contribute to local distinctiveness. This includes holiday accommodation (C1), or business (B1) uses (Policy E1: Supporting a rural economy); work live units (Policy E2: Rural economy: live-work units); new business and commercial development and the small-scale expansion of existing employment premises (Policy E3: Opportunities for new and/or improved business development in Zone A); communications infrastructure (Policy DS3); new community facilities and services (Policy C3); and renewable energy provision (Policy DS9).

- 5.37 The Neighbourhood Plan's focus on conserving and enhancing the historic environment (discussed in the next section) will also support landscape and villagescape character and local distinctiveness.
- 5.38 Overall, the Neighbourhood Plan policies have a strong focus on protecting and enhancing landscape character, the quality of the public realm and local distinctiveness.

Historic Environment

- 5.39 No historic environment constraints are present in the immediate vicinity of the Slate and Tile site allocation. Whilst Honiton Road, adjacent to the site, broadly follows the line of the line of the Roman road between Exeter and Honiton (which is listed on the Devon HER), development of the site is unlikely to affect the archaeological potential of this route.
- 5.40 More broadly, the Neighbourhood Plan policies have a close focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings. In this respect, Policy DS1 (Development of high-quality design) seeks to ensure that designated and non-designated heritage assets and their settings are conserved and enhanced, with proposals that adversely impact upon these not being supported. The policy also stipulates that development proposals should have regard to the Clyst Honiton Village Character Assessment (2015). Given the character assessment sets out the unique qualities and key features that define the distinctive character of Clyst Honiton, this provides an appropriate basis for supporting the historic fabric and setting of the village. Policy DS8 also supports the retrofit of heritage properties/assets to reduce energy demand and to generate renewable energy where appropriate *"providing it safeguards significant characteristics and development is done with engagement, and permissions of relevant organisations."*
- 5.41 The historic environment of Clyst Honiton will be further supported by the policies which focus on conserving and enhancing landscape and villagescape character and local distinctiveness and a sense of place. These have been discussed in more detail under the 'Landscape' SEA theme above.

Land, Soil, and Water Resources

- 5.42 The Slate and Tile site allocation will take place on previously developed land, which will support the efficient use of land.
- 5.43 In terms of water resources, Policy DS2 (Sustainable design and construction of buildings) promotes the use of measures which limits water use in new buildings. Conversions and retrofits of properties are also encouraged by the policy to incorporate water efficiency measures.
- 5.44 A number of the policies seek to protect key features of landscape and biodiversity interest, areas of landscape sensitivity and promote enhancements to green space and open space provision (discussed further under the 'Biodiversity' and 'Landscape' SEA themes above). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including through the promotion of high-quality green infrastructure networks in the neighbourhood area and the protection and enhancement of key landscape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

Population and Community

- 5.45 The Clyst Honiton Neighbourhood Plan sets out a range of provisions which will support the quality of life of the parish's residents.
- 5.46 In terms of housing delivery, the Neighbourhood Plan allocates just one site for nine dwellings; the Slate and Tile site. Whilst the modest level of development being planned for by the Neighbourhood Plan would only marginally influence the local housing stock, it was considered necessary to ensure that the new homes would be of a type and tenure to provide affordable houses and to bring forward only 1- or 2-bedroom properties to balance the housing stock. Furthermore, the level of development proposed, albeit small, exceeds EDDC's indicative housing allocation figure of zero houses. However, the level of growth proposed is considered to be in keeping with delivering community benefits as well as being in scale with the spatial context of the Clyst Honiton Neighbourhood Plan area.
- 5.47 The Slate and Tile site will deliver nine 1- and 2-bedroom dwellings fronting on to York Terrace, suitable for both young people and those wanting to downsize. Furthermore, Policy SA1 provides support for additional provision of onsite affordable houses.
- 5.48 The delivery of housing which meets local requirements will also be supported by Policy H1 (Self – Build and Custom Build Houses), which will support those looking to build their own homes in the parish. This includes through a requirement of 10% self-build and custom build dwellings on all residential schemes of 30 houses or above, and on single plots and infill plots. Self-build and custom build have been shown to be in many locations an effective mechanism for delivering high quality and affordable homes for local people. In addition to enabling residents to build affordable homes which meet their specific needs, an encouragement of self-build will also help contribute towards the creation of high quality, distinctive and diverse residential neighbourhoods.
- 5.49 Whilst the delivery of a range of types and tenures of housing is an important element of meeting housing need, the quality of housing is also a central consideration for the quality of life of residents. In this respect the Neighbourhood Plan sets out provisions for delivering high quality housing. This includes through Policy DS1 (Development of high-quality design) and Policy DS2 (Sustainable design and construction of buildings), which highlight a range of design elements which new development should reflect. The quality of neighbourhoods will also be supported by site allocation Policy SA1 which has a close focus on delivering a high level of residential amenity through appropriate and high-quality design and layout.
- 5.50 Supporting the quality of housing further, the Neighbourhood Plan policies have a strong focus on delivering energy efficient housing. In this respect Policy DS2 (Sustainable design and construction of buildings) highlights that the design and standard of new development and redevelopment "*will be required to meet a high level of sustainable design and construction and for energy efficiency to deliver the latest zero-carbon emissions target.*" Similarly, Policy DS8 (Provision and use of renewable energy) highlights that the design and standard of any new development should aim to meet a high level of sustainable design and be optimised for renewable energy to comply with zero-carbon emissions..
- 5.51 These provisions will therefore facilitate the delivery of high quality and energy efficient housing, promoting the quality of life of residents in the neighbourhood area, supporting social inclusion and helping to address issues such as fuel poverty.
- 5.52 Access to community facilities is a key contributor to residents' quality of life. As discussed above, the vitality of Clyst Honiton has been undermined by a recent loss of village amenities, including the school which relocated to Cranbrook in 2012. A key

aim of the Neighbourhood Plan is therefore to protect and enhance community provision in Clyst Honiton.

- 5.53 In terms of existing facilities, Policy C1 (Community facilities and services) seeks to enhance the viability and / or community value of St Michaels and All Angels Church, The Duke of York Public House, The Exeter Inn Public House, and the Parish Field. The policy sets out provisions which seek to preclude the loss of these assets, and where possible, facilitate enhancements.
- 5.54 Enhancements to community facilities will be supported by Policy C3 (New community facilities and services), which highlights the Neighbourhood Plan's support for the provision of new community amenities and Policy C2 which seeks to support a Neighbourhood Development Order to bring forward a new community building supported by open space and parking. Policy C3 also highlights support for the premise of an additional community facility within the space designated as the River Clyst Park (as reinforced by Policy NE3). The benefits to the quality of life of residents from green infrastructure enhancements facilitated through the Neighbourhood Plan are discussed under the Health and Wellbeing theme below.
- 5.55 Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In relation to the proposed housing allocation taken forward through the Neighbourhood Plan, the site is accessible to the limited services and facilities in the neighbourhood area. Importantly though, access to key public transport and cycle links is also available along Honiton Road, which provide links to the key service centres of Exeter and Cranbrook. Accessibility will also be supported by the Neighbourhood Plan's support for sustainable transport use. This has been discussed under the 'Transportation' SEA theme below.
- 5.56 The Neighbourhood Plan also seeks to promote the economic vitality of the neighbourhood area and support employment opportunities. Notably, Policy E3 (Opportunities for new and/or improved business development in Zone A) identifies three locations suitable for new employment development (at existing brownfield business park sites or at Exeter Inn Car Park). These are opportunities to largely build upon existing employment connections and develop the economic profile (subject to criteria outlined within the policy). Outside of the settlement area, any further employment development is expected to be connected (adjacent) to the village.
- 5.57 The local economy will also be supported by the CHNP's focus on supporting the rural economy. This includes through Policy E1 and E2, which promote proposals for holiday accommodation and proposals for work-live units. Economic vitality will be further supported by Policy DS3 (Communications Infrastructure), which seeks to develop communications infrastructure, incorporating the latest high-speed telecommunication networks including superfast broadband. This recognises the importance of small businesses, running a business from home and homeworking in the area.
- 5.58 Overall, the Neighbourhood Plan has the potential to have significant positive effects in relation to the Population and Communities SEA theme through delivering high quality housing which meets local needs, by delivering enhancements to community infrastructure, supporting accessibility and social inclusion, and through facilitating enhancements to economic vitality.

Health and Wellbeing

- 5.59 A key impact of the Neighbourhood Plan's policies on health and wellbeing will be through enhancing the neighbourhood area's built environment and public realm and the delivery of green infrastructure provision. Green infrastructure provides space – including natural green space – for recreation and relaxation, and access to nature has

been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation⁴¹. This will support physical and mental health and wellbeing. Key policies in this regard include Policies NE1-NE4, which facilitate the protection and enhancement of existing green spaces (including through the delivery of a number of Local Green Spaces) and through the implementation of a range of provisions for protecting and enhancing key green infrastructure assets in the landscape. Proposals include the development of the River Clyst Park Community Local Green Space through Policy NE3, and the allocation of five further Local Green Spaces through Policy NE4 (Local Green Spaces). The Neighbourhood Plan also presents a Green Infrastructure Proposals map, which highlights a primary, secondary and local network of proposed key green infrastructure linkages, a 'green ring' and important areas of local open space. Policy C2 further supports the development of a Neighbourhood Development Order to deliver a new community building with supporting new open space in an accessible location in the settlement.

- 5.60 Accessible green infrastructure provision in Clyst Honiton will also be supported by Policy AC2, which sets out the key public realm improvements to be undertaken in the village, and Policy AC3, which sets out provisions for enhancing local walking and cycling networks. Promoting the use of active modes of travel and healthier lifestyles, these elements are discussed further under the 'Transportation' SEA theme below. These policies will also support road safety in Clyst Honiton through supporting the safety of vulnerable road users.
- 5.61 As discussed under the Population and Community SEA theme, the Neighbourhood Plan seeks to support the delivery of high quality and energy efficient housing of a range of types and tenures. The policies also seek to ensure that new development is safe, attractive, inclusive and accessible, and is not subject to unnecessary noise and air pollution. In this respect the Neighbourhood Plan will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.

Transportation

- 5.62 The Slate and Tile site allocation is located in proximity to the limited services and facilities in Clyst Honiton village centre. The allocation is also accessible to key public transport and cycle links along Honiton Road, which provide connections with Exeter and Cranbrook. This will support accessibility and promote the use of alternative modes of transport to the car.
- 5.63 The Neighbourhood Plan policies otherwise have a close focus on promoting the use of sustainable modes of transport.
- 5.64 In terms of pedestrian linkages, Policy AC3 (Active Travel Provision) sets out a range of provisions for enhancing walking networks in the neighbourhood area. This includes an aim to deliver three new pedestrian routes and provide new links to the Sky Park Fitness Trail, Clyst Valley Trail and the WWII Fighter Pen. The policy also seeks to capitalise upon Clyst Honiton's links to the local cycle network. The policy encourages development which contributes to connections to: National Cycle Network Route 2 and Route 34 (Exe Estuary Trail); Killerton Trail and Ashclyst Forest; and Crealy Theme Park and Resort.
- 5.65 Additionally, Policy AC3 states that development proposals should be designed to create natural surveillance of active travel routes, with appropriate lighting, and the loss of existing routes should be resisted unless a replacement route is provided as

⁴¹ Public Health England (2017)

part of the development. It also highlights that proposals for the provision of cycle and E bike racking will be supported.

- 5.66 Other policies which support sustainable transport use include Policy DS1 (Development of high-quality design), which seeks to create well defined, attractive and secure streets and spaces, faced by active frontages and link into and enhance the existing pedestrian and cycle network and facilitate future connectivity and sustainable transport options, and Policy DS6 (Storage spaces) which seeks to ensure that new residential development is accompanied by secure external storage to accommodate bicycles, scooters and / or mobility aids. These sustainable transport provisions are also supported by the site allocation Policy SA1, which ensures safe vehicular, pedestrian and cycle access from the site.
- 5.67 A number of the policies also seek to limit the impact of parking through delivering appropriate parking provision. This includes Policy AC1 (Parking Provision), Policy E3 (Opportunities for new and/or improved business development in Zone A), and the site allocation Policy SA1.
- 5.68 In addition, the policies which support enhanced community infrastructure provision in Clyst Honiton will help reduce the need to travel to key facilities. These include: Policy C1 (Community facilities and services), which seeks to support existing community assets; Policy C2's support for a Neighbourhood Development Order, and Policy C3's focus on encouraging the delivery of new community facilities and services in the neighbourhood area.

Conclusions at this current stage

- 5.69 The assessment has concluded that the current version of the CHNP is likely to lead to significant positive effects in relation to the 'Population and Community' SEA theme. These benefits largely relate to the Neighbourhood Plan's focus on delivering housing which meets local needs, improving the quality of life of residents and promoting community vitality. In addition, the Neighbourhood Plan's close focus on community infrastructure development, green infrastructure enhancements, pedestrian and cycle network improvements and the delivery of a high-quality public realm will lead to significant positive effects in relation to the 'Health and Wellbeing' and 'Transportation' SEA themes.
- 5.70 With regards to the 'Land, Soil and Water Resources' SEA theme, positive effects are considered as the site allocation is focused on brownfield land, supporting the efficient use of land within the Neighbourhood area.
- 5.71 In relation to the 'Climate Change' theme, the Neighbourhood Plan seeks to deliver energy efficient development, facilitate renewable energy provision, and encourage sustainable transport and electric vehicle use. This will support climate change mitigation. It also closely recognises the flood risk issues present in the neighbourhood area and at the site allocation and provides an additional level of protection and the necessary mitigation. As such, it is considered that the Neighbourhood Plan will have broadly neutral to minor positive effects in relation to climate change adaptation.
- 5.72 Otherwise, in relation to the 'Landscape' and 'Historic Environment' themes, the CHNP policies will provide a robust basis for the protection and enhancement of landscape and villagescape character in the neighbourhood area and the conservation of historic environment assets in Clyst Honiton (and their settings). The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'Environmental Quality' and, 'Biodiversity' SEA themes. However, these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan and the scale of proposals.

6. Next steps

- 6.1 The CHNP and this Environmental Report have been submitted to the Local Planning Authority, East Devon District Council, for independent examination. At independent examination, the CHNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 6.2 Assuming the examination leads to a favourable outcome, the CHNP will then be subject to a referendum, organised by East Devon District Council. If more than 50% of those who vote agree with the CHNP, then it will be 'made'. Once 'made', the CHNP will become part of the development plan for East Devon District Council, covering the defined neighbourhood area.

Appendix A Context review and baseline

A.1 Environmental Quality

Policy context

National

Key messages from the National Planning Policy Framework⁴² (NPPF) include:

- Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, considering the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
- Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

The Clean Air Strategy 2019⁴³ identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.⁴⁴ This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "the link between improving air quality and reducing carbon emissions is particularly important" and that

⁴² MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf [accessed 17/03/20].

⁴³ DEFRA et al. (2019) Clean Air Strategy 2019 [online] available at: <https://www.gov.uk/government/publications/clean-air-strategy-2019> [accessed 17/03/20].

⁴⁴ DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf [accessed 17/03/20].

consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'⁴⁵ sets out several goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25-year plan directly relate to the air quality SEA theme.

Local

In terms of the local context, East Devon District Council is required under Section 82 of the Environment Act (1995) to monitor air quality across the District, report regularly to DEFRA, and act where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide (NO₂), sulphur dioxide (SO₂), ozone (O₃), benzene (C₆H₆) and particulates (PM₁₀). Where exceedances exist, areas are declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

Policies Strategy 38 – Sustainable Design and Construction and EN14 – Control of Pollution from the East Devon Local Plan relate to the Air Quality SEA theme.

Summary of baseline

Current baseline

Air Quality Management Areas (AQMAs) are areas declared due to exceedances in annual mean concentrations of NO₂. As of April 2020, there are currently no AQMAs within the wider District as highlighted in the 2019 Annual Status Report (ASR)⁴⁶.

Noise quality is a key issue for parts of Clyst Honiton, including associated with the presence of Exeter Airport to the east of the parish.

Bickerdike Allen Partners LLP (BAP) were appointed by Clyst Honiton Parish Council to undertake a noise assessment to accompany the potential taking forward of a Neighbourhood Development Order at the Clyst Honiton Bypass Site. A noise assessment was prepared and issued in 2020, and updated in March 2023.⁴⁷ The report included a review of the Bypass Site against the most recent noise contours for Exeter Airport available at the time.

This work built on previous noise assessment work BAP had undertaken in the area. This included: in 2000 on behalf of EDDC associated with residential growth areas near Exeter Airport (this was subsequently updated in 2015 through a review of future noise contours for the airport); in 2009 on behalf of Balfour Beatty Management to calculate noise contours in the vicinity of Exeter Airport; in 2017 the preparation of a Joint Noise Study on behalf of Exeter Airport and Devon County Council (DCC) in relation to the Sky Park development; and in 2021 to provide additional information for the Cranbrook/Treasbare Garden Village Planning application.

⁴⁵ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 02/03/20].

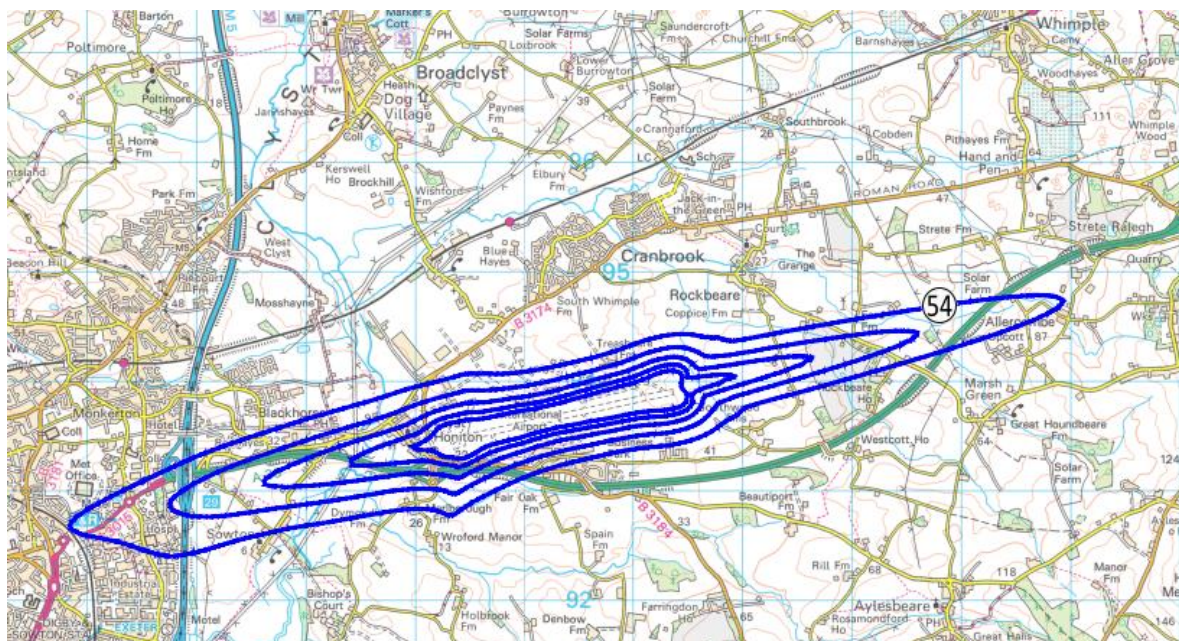
⁴⁶ Devon District Council (2019): 'Annual Status Report' [online] available to download from: <https://eastdevon.gov.uk/environmental-health-and-wellbeing/land-air-and-water-pollution/air-quality/review-monitoring-and-assessment-reports/2019-to-2020-8th-round/> [accessed 01/04/20].

⁴⁷ BAP (June 2020, with update in March 2023) Noise Assessment at Clyst Honiton Bypass Site

The 2020 and 2023 noise assessment for the Clyst Honiton Bypass Site indicated that noise mitigation measures would be required for future development within the area. The noise assessment identified the following sources of pollution at this location:

- General ambient noise from the distant and local roads, in particular the Clyst Honiton Bypass;
- Noise of aircraft operations at Exeter Airport;
- Noise from ground running of aircraft engines at the engine test facility;
- Noise from the Skypark located to the east of the development site;
- Freight deliveries from the operation of DPD and Lidl delivery port

As part of the studies, a number of noise contour maps have been produced, which highlight predicted future air noise levels to 2030. The noise contours based on the 2017 Joint Noise Study are depicted in the figure below.



Noise contours,
█ 54 to 66 dB LAeq,16h in 3 dB steps,
 from BAP report A9975-R01a-LBA dated
 13/04/2017 and based on 2017 Joint
 Noise Study forecasts provided by the
 airport in relation to SkyPark
 development

Figure A1.1: Airborne Aircraft Noise Contours 2030 Forecast Average Summer Daytime, based on 2017 Joint Noise Study

Source: BAP (March 2023) Noise Assessment at Clyst Honiton Bypass Site

The Department for Communities and Local Government provides guidance to determine noise impact for future development, advising local planning authorities to take account of, in particular whether a 'significant adverse effect is occurring or likely to occur', whereby 'significant effect' is defined as 'the level of noise exposure above which significant adverse effects on health and quality of life occur'.

Category C noise bands indicate requirements for noise mitigation measures for proposed development at minimum. In relation to the independent study, the decibel (dB) threshold for at least a Category C designation for different noise sources were provided in LAeq, defined

as the level of notional sound which (over a given time, T) would deliver the same A-weighted sound energy as actual fluctuating sound:

- Air noise- $60_{LA_{eq,16h}}$ (daytime exposure) and $50_{LA_{eq,8h}}$ (night-time exposure) or above,
- Ground noise- $55_{LA_{eq,16h}}$ (daytime exposure) or above (not applicable for night-time),
- Road traffic noise- $50_{LA_{eq,16h}}$ (daytime exposure) and $60_{LA_{eq,8h}}$ (night-time exposure).

Modelling for air and ground noise (aircraft noise) was taken from 2015 data, and used to predict 2030 scenarios. It is noted that current airport activity has reduced since 2015, so data should be approached from the perspective of a 'worst case scenario'. The residential part of the development, located in the northern part of the site, as a worse case in 2030 is predicted to lie within the range of 57-60 dB $LA_{eq,16h}$ during the day and 51-54 dB $LA_{eq,8h}$ at night. This would place this part of the site in noise category C.

In summary, data presented in this report indicates that noise mitigation measures will be required for proposed development within the Clyst Honiton Bypass site, and potentially for other sites within the Neighbourhood Plan area.

Future baseline

The impacts of noise pollution can be detrimental to future development. Aircraft noise has the potential to disturb future residents through overhead flights and noise on the ground from aircrafts and their carriers. This has the potential to lead to adverse effects on the health and quality of life of residents within the neighbourhood through physiological and psychological harm in the short and long term.

Additionally, noise from the nearby road enhancements has the potential to exacerbate stress for residents through sleep disturbance in the night-time and increased alertness in the daytime, which has long term implications for residents' health.

Noise pollution in the long term can severely harm local wildlife (discussed in Chapter 3), through displacement, which has greater implications on the local wildlife network.

A.2 Biodiversity

Policy context

National

Key messages from the National Planning Policy Framework⁴⁸ (NPPF) include:

- *'Contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity'.*
- *Plans should: 'distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries'.*
- *Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising*

⁴⁸ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.

- To protect and enhance biodiversity and geodiversity, plans should:
 - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
 - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
 - The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

The Government's 25 Year Environment Plan⁴⁹ (2018) sets out a strategy for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations. These aims are supported by a range of policies which are focused on six key areas. In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 '*Securing clean, productive and biologically diverse seas and oceans*' directly relate to biodiversity and geodiversity.

Published in July 2021, paragraph 174 (d) within the revised NPPF⁵⁰ states that planning policies and decisions should contribute to and enhance the natural and local environment by 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan⁵¹ (which was published in January 2018) and the Environment Act⁵² (which received Royal Assent in November 2021).

The Biodiversity 2020 Strategy⁵³ (2011) presents a strategy for England's wildlife and ecosystem services which builds on the Natural Environment White Paper⁵⁴ and sets out the "*strategic direction for biodiversity for the next decade*". The strategy aims to halt biodiversity loss and improve ecological networks and ecosystems for all people.

The UK Biodiversity Action Plan⁵⁵ (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

⁴⁹ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

⁵⁰ DLUHC (2018): 'Revised National Planning Policy Framework', [online] available to access via [this link](#)

⁵¹ DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via [this link](#)

⁵² GOV.UK (2021): 'Environment Act', [online] available to access via [this link](#)

⁵³ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services> [accessed 02/03/20].

⁵⁴ Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf> [accessed 02/03/20].

⁵⁵ JNCC (2007) UK BAP priority species [online] <http://archive.jncc.gov.uk/page-5717>

The South-East Devon European Site Mitigation Strategy provides a strategy to mitigate for the potential in-combination impacts of new housing development on three European wildlife sites within and in the vicinity of East Devon District: the Exe Estuary Special Protection Area (SPA) and Ramsar site, Dawlish Warren Special Area of Conservation (SAC) and the East Devon Pebblebed Heaths SAC/SPA.

At the local level, policies in the East Devon Local Plan that relate to the Biodiversity and Geodiversity SEA theme include:

- Strategy 5 – Environment;
- Strategy 6 – Development within Built-Up Area Boundaries;
- Strategy 10 – Green Infrastructure in East Devon’s West End
- Strategy 38 – Sustainable Design and Construction;
- Strategy 47 – Nature Conservation and Geology;
- D3 – Trees and Development Sites; and
- EN5 – Wildlife Habitats and Features.

Local

The Devon Biodiversity Action Plan (BAP) was last revised in 2009, and identified key wildlife and geological features in Devon, as well as setting key priorities for nature conservation. With regards to legislation and planning, the following key objectives are stated within the Common Themes document of the BAP:

- *‘Ensure that policies within statutory development plans fully recognise the importance of the biodiversity and geological features of Devon, and the need to maintain them.*
- *Ensure full consideration of nature conservation issues in the implementation of all planning and regulatory functions, in order to maintain the full range, extent and quality of Devon’s biodiversity and geological heritage.*
- *Seek to reconcile the objectives of bio- and geodiversity conservation with the need for economic and social development in Devon, to achieve environmental sustainability.’*

At the local level, policies in the East Devon Local Plan that relate directly to the Biodiversity and Geodiversity SEA theme include:

- Strategy 5 – Environment;
- Strategy 6 – Development within Built-Up Area Boundaries;
- Strategy 38 – Sustainable Design and Construction;
- Strategy 47 – Nature Conservation and Geology;
- D3 – Trees and Development Sites; and
- EN5 – Wildlife Habitats and Features.

Summary of baseline

Current Baseline

There are no internationally designated sites within the boundary of the Plan area. However, notable sites in the vicinity of Clyst Honiton include:

- Exe Estuary Special Protection Area (SPA) and Ramsar site)
- East Devon Pebblebed Heaths Special Area of Conservation (SAC)

This is of significance as Clyst Honiton falls within the 10km zone of contributions for both the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC. As per the 2014 SE Devon European Site Mitigation Strategy, development proposals within these zones may be required to provide a financial contribution towards mitigating additional recreational pressure generated by new development, potentially including contributions towards provision of Suitable Alternative Natural Greenspace (SANGs).

Sites of Special Scientific Interest (SSSI) Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs.



Whilst there are no SSSIs located within or adjacent to the Neighbourhood Plan area, the whole of the parish is within SSSI IRZs for the types of development likely to be brought forward through the Neighbourhood Plan, namely: residential and rural residential development types. These are associated with the East Devon Pebblehead Heath and the Exe Estuary SSSI

With regards to key biodiversity habitats present locally, the southern part of the Clyst Honiton Neighbourhood Plan area spans across farmland. Farmland in East Devon can provide habitats for a variety of domestic species, including small mammals, barn owls and kestrels, various insects and ground-nesting birds⁵⁶. Small areas of deciduous and young woodland are also present on the outskirts of the village centre, which have the potential to host similar domestic species. Traditional orchard habitat is also present within the northern part of the Neighbourhood Plan area. Coastal and floodplain grazing marsh habitat is present adjacent to major flood corridors in the north western part of the Neighbourhood Plan area. The coverage of these are presented in the figure below.

⁵⁶ Devon County Council (n.d.): 'Farms' [online] available from: <https://www.devon.gov.uk/environment/wildlife/habitats-and-species/farms> [accessed 01/04/20].

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LEGEND

-  Clyst Honiton Neighbourhood
-  Plan Area

Biodiversity Action Plan Priority Habitats

-  Coastal and Floodplain
-  Grazing Marsh
-  Deciduous Woodland
-  Good Quality Semi-improved Grassland
-  Lowland Fens
-  Purple Moor Grass and Rush Pastures
-  Traditional Orchard

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Purpose of Issue
DRAFT

Client
CLYST HONITON PARISH COUNCIL

Project Title
SEA OF THE CLYST HONITON NEIGHBOURHOOD PLAN

Drawing Title
BIODIVERSITY DESIGNATIONS

Drawn	Checked	Approved	Date
CN	JW	CD	16/04/2020
ACCOM Internal Project No. 60571087		Scale @ A4 1:25,000	

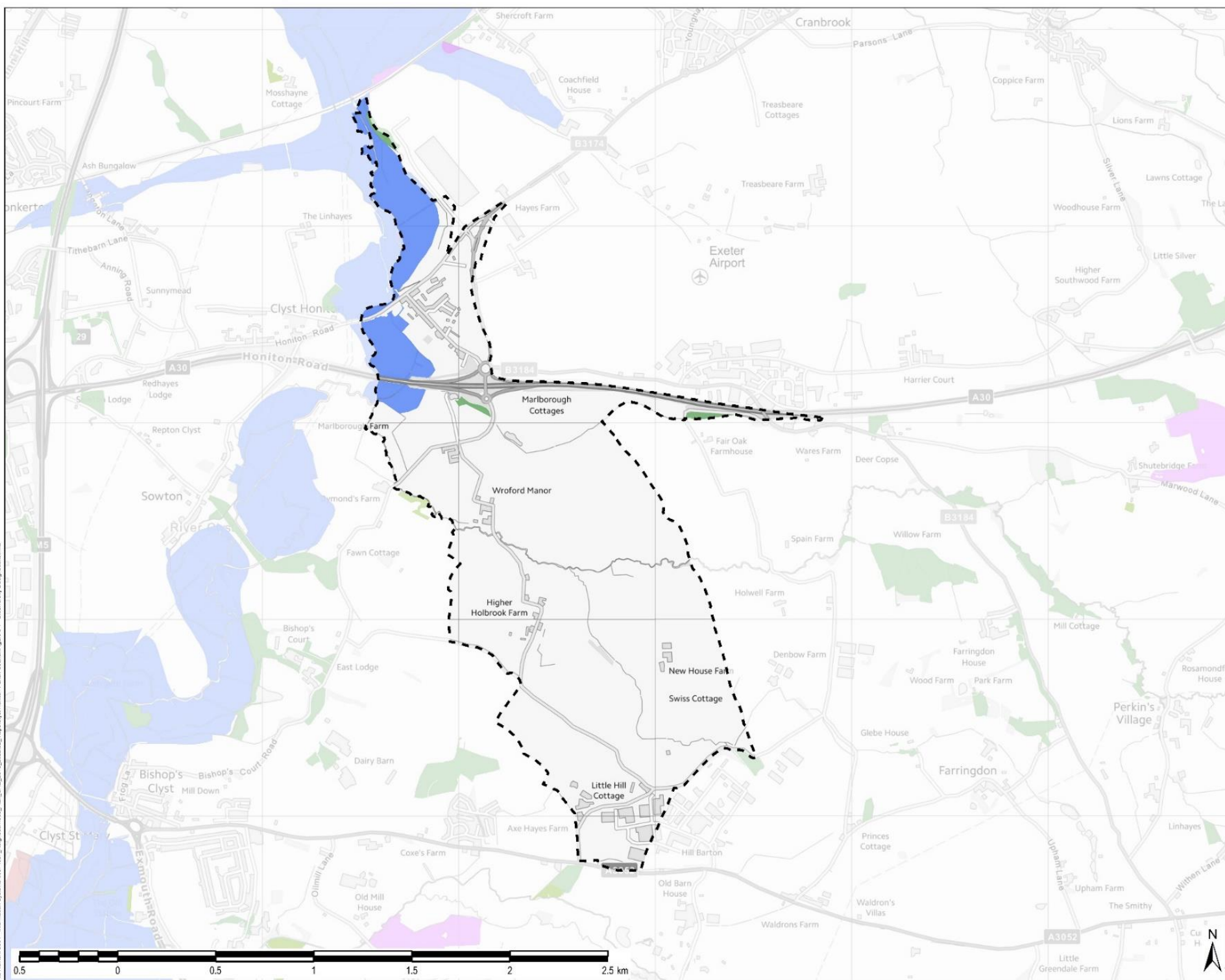
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AECOM
 10000 Park Street
 London EC2A 4PU
 Telephone: +44 (0)20 7638 3300
 Fax: +44 (0)20 7638 3301
 www.aecom.com

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Future Baseline

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

Development in Clyst Honiton may be required to contribute to mitigation strategies for the Exe Estuary SPA and the East Devon Pebblebeds SAC. However, the Clyst Valley Regional Park may have potential to provide enough strategic Suitable Alternative Natural Greenspace (SANGs) without the need for further additional mitigation.

A.3 Climate Change

Policy context

National

Key messages from the National Planning Policy Framework⁵⁷ (NPPF) include:

- Plans should take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.
- Plans should take account of the effects of climate change in the long term, considering a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment'* including by *'mitigating and adapting to climate change'* and *'moving to a low carbon economy.'* The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

⁵⁷ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf [accessed 02/03/20].

The Flood and Water Management Act (2010)⁵⁸ sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The UK Climate Change Act⁵⁹ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'⁶⁰ which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from local authorities. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.
- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk

⁵⁸ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> [accessed 02/03/20].

⁵⁹ HM Government (2008): 'Climate Change Act 2008' [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [accessed 02/03/20].

⁶⁰ CCC (2012) 'How local authorities can reduce emissions and manage climate risks' [online] available at: <https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/> [accessed 02/03/20].

Assessment, the Adaptation Sub-Committee commissioned an evidence report ⁶¹ containing six priority risk areas requiring additional action in the next five years:

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

The Clean Air Strategy⁶² released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

Local

East Devon District Council declared a climate emergency in July 2019⁶³.

At the local level, the East Devon Climate Change Strategy (2020- 2025)⁶⁴ sets out the following vision for the district: 'To become a carbon neutral council working within a low carbon economy and lifestyle, reflected in our travel, homes, businesses, visitor experiences and communities.' Other key priorities include:

- Increase resilience to climate change to maintain East Devon as a safe and healthy place to live, work and visit.
- Enable reductions in greenhouse gas emissions from energy consumption in homes, transport and businesses in East Devon.
- Enable the development of secure supplies of renewable and low carbon energy for individuals, communities, business and industry.
- Support new development which seeks to minimise additional associated greenhouse gas emissions.
- Contribute towards developing the low carbon economy.

At the local level, policies in the East Devon Local Plan that relate to the Climate Change SEA theme include:

- Strategy 3 – Sustainable Development;
- Strategy 5 – Environment; and
- Strategy 38 – Sustainable Design and Construction.

⁶¹ DEFRA (2017) 'UK Climate Change Risk Assessment Report January 2017' [online] available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017> [accessed 02/03/20].

⁶² HM Gov (2019) Clean Air Strategy 2019 [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf [accessed 02/03/20].

⁶³ East Devon District Council (2019): 'East Devon District Council to progress plans for zero carbon growth' [online] available from: <https://eastdevon.gov.uk/news/2019/07/east-devon-district-council-to-progress-plans-for-zero-carbon-growth/> [accessed 04/04/20].

⁶⁴ East Devon District Council (n.d.): 'East Devon District Council Climate Change Strategy' [online] available to download from: <https://democracy.eastdevon.gov.uk/documents/s7944/EDDC%20Climate%20Change%20Strategy.pdf> [accessed 28/04/20].

Summary of baseline

Current Baseline

Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office released the UK Climate Projections for 2018 (UKCP18).⁶⁵ UKCP18 provides the most up to date climate observations and projections out to 2100, using cutting-edge climate science. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile) for South West England during the period 2040-2059 compared to the period 1981-2000 are likely to be as follows⁶⁶:

- The central estimate of increase in annual mean temperatures of between 2°C and 3°C; and
- The central estimate of change in annual mean precipitation of +10 to +20% in winter and -20% to -30% in summer.

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

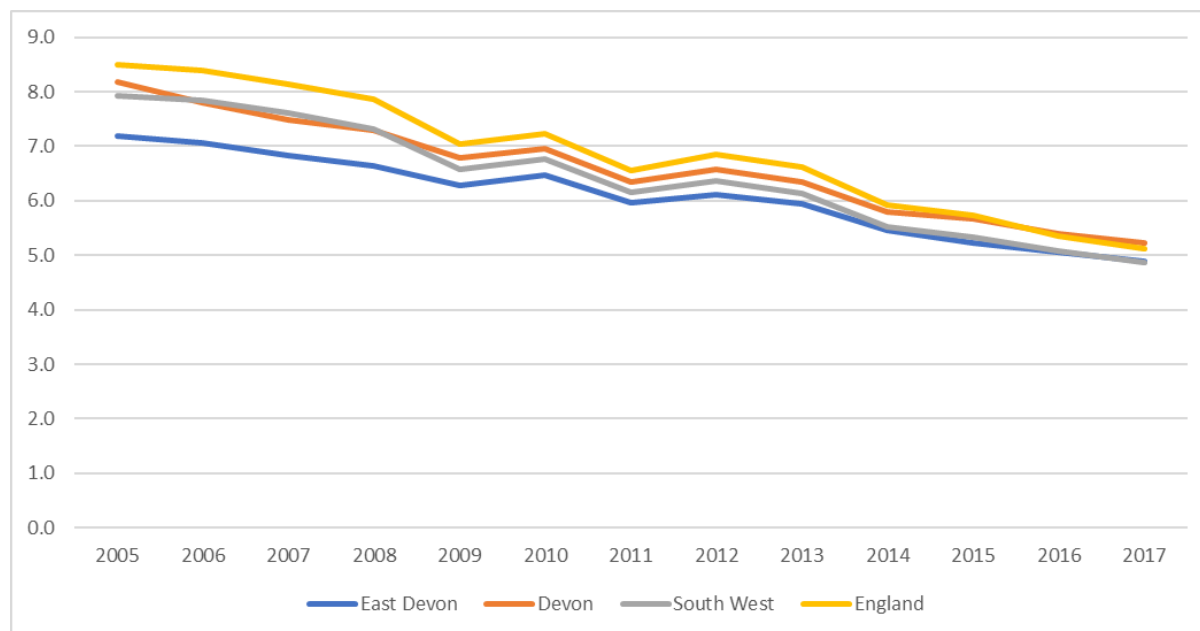
- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;

⁶⁵ Data released 26th November 2018 [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp> [accessed 04/03/20].

⁶⁶ Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> last accessed [17/01/19]

- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Figure: Per capita CO₂ emissions (t) 2005-2017



CO₂ emissions from the built environment are monitored and recorded at Local Authority level.⁶⁷ The figure above shows that CO₂ emissions in East Devon have declined over the period of 2005- 2017 (-68%), to an overall greater extent than regional (-61.5%) and national statistics (-60.3%). However, over the period of 2013- 2017, emissions in East Devon have decreased at the slowest rate in comparison to figures at the regional and national level. Within East Devon, the Transport sector is identified as the main contributing sector to emissions in 2017, with emissions from A-roads the predominant source. The Industry and Commercial sector is the next greatest contributor, and this is predominantly from the use of electricity. Within the Domestic sector, the primary production of CO₂ is sourced from burning gas.

The figure below shows the extent of fluvial flood risk within the Neighbourhood Plan area. Areas of highest fluvial flood risk (probability > 1 in 100 of flooding within the Plan area), covers the majority of the central residential area in the village, and smaller areas further south, which are adjacent to the River Clyst, and its main tributaries.

⁶⁷ Department for Business, Energy and Industrial Strategy (2019) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 [online], available from: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017> [accessed 21/04/20].

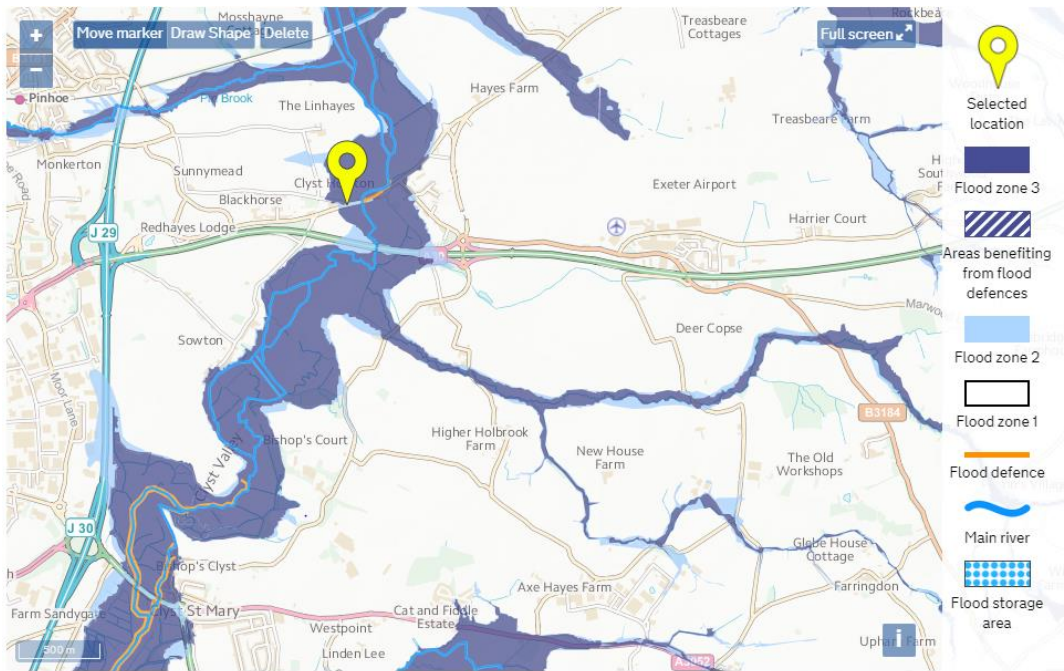


Figure: Fluvial flood risk

The figure below shows that surface water flood risk in the Neighbourhood Plan area also broadly follows the corridor of the River Clyst. Regions of particularly high surface water flood risk within Clyst Honiton include those in proximity to the A30 roundabout which bisects the Neighbourhood Plan area in the north.



Figure: Surface water flood risk

Future Baseline

New development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

Additionally, climatic changes can affect local flood risk in several ways. Wetter winters and more of this rain falling in wet spells may increase river flooding. More intense rainfall causes more surface runoff, increasing localised flooding and erosion. In turn, this may increase pressure on drains, sewers and water quality. Rising sea or river levels may increase local flood risk inland or away from major rivers because of interactions with drains, sewers and smaller watercourses. Impacts will likely depend on local conditions and vulnerability.

Widespread implementation of SuDS could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding where possible.

Per capita emissions in Clyst Honiton are likely to decline over time in line with the trend evident at district, regional and national scale as energy efficiency measures, renewable energy take-up and new technologies, such as electric vehicles, become more widely adopted. The declaration of a climate emergency in East Devon will likely see greater focus on the role that plan-making can play in tackling harmful emissions.

A.4 Landscape

Policy context

National

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

- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.
- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
- Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and

- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

The Government's 25 Year Environment Plan states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England. Along with the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes', Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's "A Green Future: Our 25 Year Plan to Improve the Environment" directly relates to the Landscape.

Local

At the local level, policies in the East Devon Local Plan that relate to the Landscape SEA theme include:

- Strategy 3 – Sustainable Development;
- Strategy 6 – Development within Built- Up Area Boundaries;
- Strategy 46 – Landscape Conservation and Enhancement and AONBs; and
- D2 – Landscape Requirements.

Summary of baseline

Current Baseline

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to its character. The Plan area falls within the Devon Redlands NCA (148). The Devon Redlands NCA is described as: *'a diverse area...in the north, the land rises to the relatively flat-topped hills with beech hedgerows, indicating the transition towards Exmoor. In the south-west, the north-south Haldon Ridge is a major sub-regional landmark and signifies a fundamental change in geology and landscape character. West of Haldon the Teign Valley is also transitional, having elements which relate it to Dartmoor in the west as well as a close interrelationship with the Haldon Ridge.'* Key characteristics include:

- Hilly landscape of villages, hamlets, farmsteads, hedge banks and winding sunken lanes, rising in height towards the fringes of the NCA.
- Steep-sided but flat-bottomed river valley cuts through the hills, opening onto wide flood plains which are important for wintering wildfowl nearer the coast.
- Large woodlands confined mainly to steep valley sides. In upper valleys small, broadleaved woodlands and copses give a strong sense of enclosure and provide valuable habitat for wildlife.
- Mixed farming predominates, but as the land rises in the transitional areas towards Dartmoor and Exmoor pasture becomes widespread.

The East Devon and Blackdown Hills Landscape Character Assessment⁶⁸ describes the variations in character between different types of area and landscape in the district. The Clyst Honiton Plan area is characterised by 'Clyst Lowland Farmlands' Devon Character Area. More specifically, the 'Lowland Plains' Landscape Character Type (LCT). The Lowland Plains LCT hosts the following distinctive features:

⁶⁸ Fiona Fyfe Associated (2019): 'East Devon and Blackdown Hills Landscape Character Assessment' [online] available at: https://eastdevon.gov.uk/media/2816886/lca_complete_final_march-2019_low-res.pdf [accessed 20/04/20].

- A range of settlements and building styles, from sleepy coastal villages to Cranbrook new town
- Historic small parks and gardens, containing a high proportion of mature and veteran trees.
- Its strong visual relationship with surrounding higher landscapes – the Lowland Plains LCT is often seen from above and is also visually influenced by surrounding LCTs.

In terms of local landscape character, the Clyst Honiton area has limited sensitivity within the landscape but still supports a rural feel in places, particularly away from the main settlement and roads. However, there are number of urbanising influences from major infrastructure assets within and adjacent to the Plan area and these limit the extent of Clyst Honiton's unspoilt rural character. These include the M5 to the west, A30 to the south and Exeter International Airport immediately east.

The village centre and residential area is concentrated in the north eastern part of the Plan area, adjacent to the airport. The remaining landscape is primarily open, agricultural land with dispersed residences, supporting intermittent views of the wider Devon countryside.

The A30 bisects the Neighbourhood Plan area and divides it into two distinct character areas. North of the A30 the airport, the B3184 and its intersection with the A30, as well as the built area of the village itself contribute to a more developed character, whilst the area south of the A30 is notably more tranquil and has fewer intrusions into its rural character.

Future Baseline

New development, including infrastructure development, has the potential to lead to incremental changes in landscape quality in and around the Neighbourhood Plan area. In particular, large scale development could have the potential to compound existing urbanising influences and adversely affect those areas of the village which retain a rural. This could also include the loss of landscape features, visual impact on existing features, and loss of tranquillity.

However, new development also has the potential to support landscape character through regeneration and development. Development which contributes to enhancing a perceptual buffer between the village and Exeter Airport, improves village settings, delivers green infrastructure improvements and new recreational opportunities and enhanced framing of key views would likely lead to positive effects.

A.5 Historic Environment

Policy context

National

Key messages from the National Planning Policy Framework⁶⁹ (NPPF) include:

- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and

⁶⁹ MHCLG (2019) National Planning Policy Framework [online]
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf [accessed 03/03/20].

landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).

- Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.
- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.

These messages are supported by the national Planning Practice Guidance (PPG)⁷⁰ which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.

The Planning (Listed Buildings & Conservation Areas) Act 1990 is a UK Act of Parliament that changed laws relating to the granting of planning permission for building works, with a focus on listed buildings and conservation areas.⁷¹ It created special controls for the demolition, alteration or extension of buildings, objects or structures of particular architectural or historic interest, as well as conservation areas.

The Ancient Monuments & Archaeological Areas Act 1979 is an Act to consolidate and amend the law relating to ancient monuments; to make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters; to provide for the recovery of grants under section 10 of the Town and Country Planning (Amendment) Act 1972 or under section 4 of the Historic Buildings and Ancient Monuments Act 1953 in certain circumstances; and to provide for grants by the Secretary of State to the Architectural Heritage Fund.⁷²

The Government’s Statement on the Historic Environment for England⁷³ sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Along with the policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’, Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’⁷⁴ directly relates to the Historic Environment.

⁷⁰ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/> [accessed 03/03/20].

⁷¹ UK Public General Acts (1990) Planning (Listed Buildings and Conservation Areas) Act 1990 [online] available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents> [accessed 02/03/20].

⁷² UK Public General Acts (1990) The Ancient Monuments & Archaeological Acts 1979 [online] available at: <https://www.legislation.gov.uk/ukpga/1979/46> [accessed 03/03/20].

⁷³ HM Government (2010) The Government’s Statement on the Historic Environment for England [online] available at: http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx

⁷⁴ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 03/03/20].

Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 (February 2016)⁷⁵ outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of Conservation Areas.
- Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)⁷⁶ provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.
- Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)⁷⁷ provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:
 - Step 1: Identify which heritage assets and their settings are affected;
 - Step 2: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
 - Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁷⁸ outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

⁷⁵ Historic England (2016): 'Conservation Area Designation, Appraisal and Management: Advice Note 1' [online] available at: <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/> [accessed 03/03/20].

⁷⁶ Historic England (2016): 'SA and SEA: Advice Note 8' [online] available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> [accessed 03/03/20].

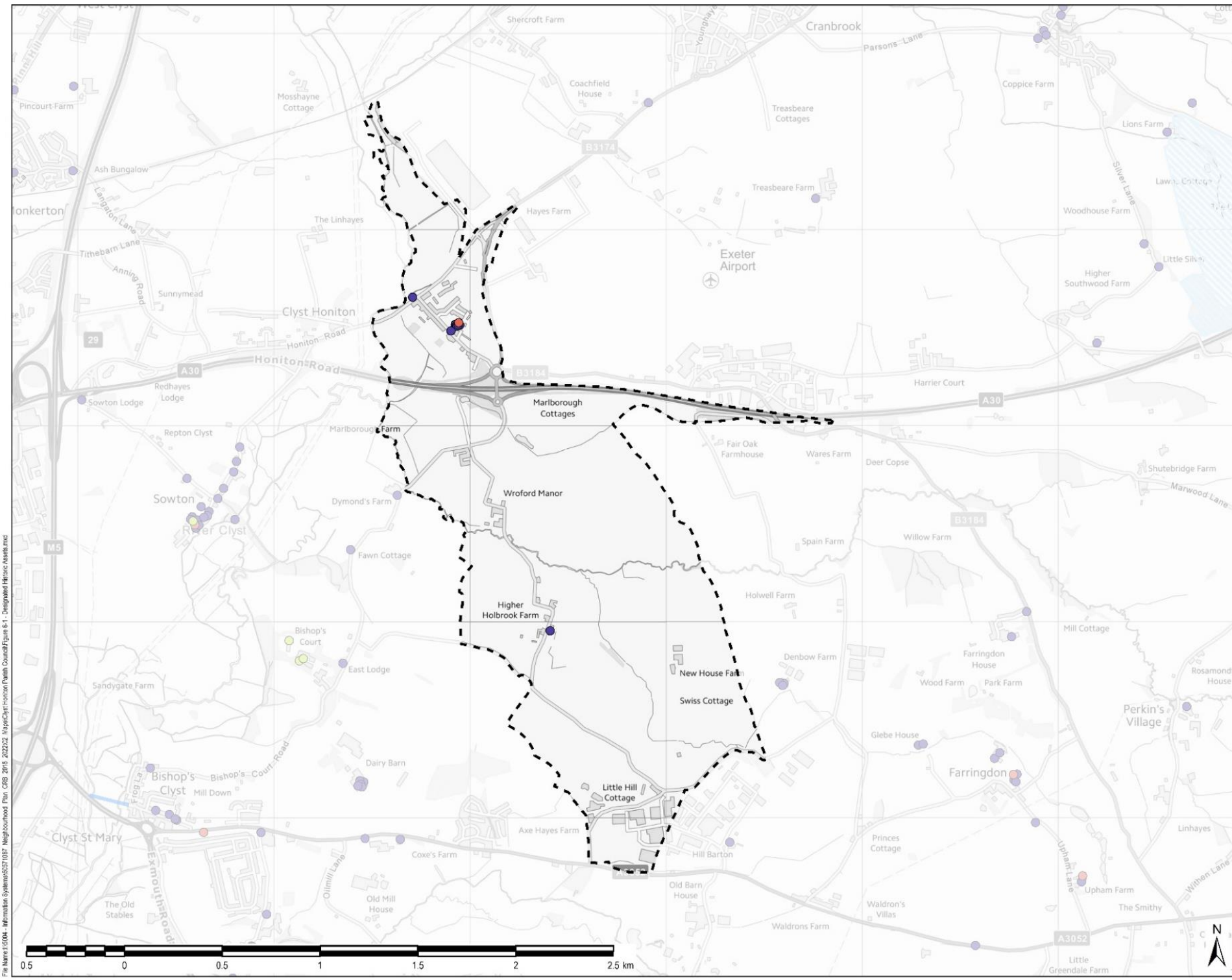
⁷⁷ Historic England (2017): 'Setting of Heritage Assets: 2nd Edition' [online] available at: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/> [accessed 03/03/20].

⁷⁸ Historic England (2018): 'Neighbourhood Planning and the Historic Environment' [online] available at: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/> [accessed 03/03/20].

Local

At the local level, policies in the East Devon Local Plan that relate to the Historic Environment SEA theme include:

- Strategy 5 – Environment;
- Strategy 49 – The Historic Environment;
- D1 – Design and Local Distinctiveness;
- EN6 – Nationally and Locally Important Archaeological Sites;
- EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance;
- EN8 – Significance of Heritage Assets and their Setting;
- EN9 – Development Affecting a Designated Heritage Asset; and
- EN10 – Conservation Areas.



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- LEGEND**
- Cyst Honiton Neighbourhood
 - Plan Area
 - Scheduled Monument
 - Registered Parks and Garden
- Listed Building**
- Grade I
 - Grade II*
 - Grade II

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Purpose of Issue: **DRAFT**

Client: **CLYST HONITON PARISH COUNCIL**

Project Title: **SEA OF THE CLYST HONITON NEIGHBOURHOOD PLAN**

Drawing Title: **DESIGNATED HISTORIC ASSETS**

Drawn	Checked	Approved	Date
CN	LW	C3	21/04/2020
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File Name: I:\0044 - Information Systems\62571087 - Neighbourhood Plan_CPB_2018_2022\22 Maps\Cyst Honiton Parish Council\Figure 6.1 - Designated Historic Assets.mxd

Summary of baseline

Current Baseline

Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. There are 10 listed buildings within the Plan area. Of these, 9 are listed as Grade II (of special interest) and one is listed as Grade II* (of more than special interest). Most are associated with St Michael's Church and its churchyard. These are identified in **Figure 6.1** and detailed below:

- **Milestone at SX 987937 (II)**- 18th century granite milestone, approximately 1.8m high.
- **South Gate and Gate Posts with Adjoining Boundary Wall of Church of St Michael (II)**- Gate, gate posts and churchyard boundary walls at Church of St Michael, dated 19th century.
- **Nicks Headstone Approximately 5 Metres South Of Nave Of Church Of St Michael (II)**- headstone dated 1799.
- **Cross Approximately 9 Metres South Of Nave Of Church Of St Michael (II)**- churchyard cross erected 1881.
- **Spear Headstone Approximately 8 Metres South Of Porch Of Church Of St Michael (II)**- headstone dated 1792.
- **Clarke Headstone 3 Metres South Of Porch Of Church Of St Michael (II)**- headstone dated 1758.
- **Squance Headstone Approximately 9 meters South East of Chancel of Church of St Michael**- headstone dated 1799.
- **Church of St Michael (II*)**- the parish church, built of local mudstone, rubble walling and medieval fabric. The basic fabric of the church has been dated from the 15th century or earlier.
- **Treasbeare Farmhouse (II)**- farmhouse, dated early 17th century.
- **Higher Holbrook (II)**- former farmhouse, dated early 17th century.

The Church of St Michael is present on the heritage at risk register⁷⁹. It is currently in poor condition due to a destroyed and rebuilt interior (1912), metal corrosion internally in arcaded capital heads and leading due to blocked valley gutters.

Devon County Council provides information regarding the location of Historic Environment Record (HER) features within the County through the Devon Environment Viewer tool. The figure below shows the location of HER features within the approximate Neighbourhood Plan area. Historic features can be seen clustered primarily within the northern half of the parish. The site currently occupied by Exeter International Airport was used as an R.A.F Sector Station and headquarters of the Polish day-fighter Wing No. 2⁸⁰ during the second World War, under lease of the Military of Defence. Several non-designated heritage assets clustered within this area retain notable historical significance to the World War II period, such as the 'Dispersed Air Defence Site EL5', 'Defence Post 32', and 'Anti-Aircraft Battery EL6'.

⁷⁹ Historic England (n.d.): 'Church of St Michael, Honiton – East Devon' [online] available from: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/list-entry/2289444> [accessed 06/04/20].

⁸⁰ The Airport Guides (n.d.): 'Exeter Airport Guide' [online] available from: <http://www.airportguides.co.uk/guides/exeter/history.html> [accessed 14/04/20].



Figure: HER monument records in Clyst Honiton (locations of sites shown in pink)

Future Baseline

Whilst the Neighbourhood Plan area is not rich in historic assets, new development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of Clyst Honiton village and better reveal assets' heritage significance.

A.6 Land, Soil and Water Resources

Policy context

National

The EU's Soil Thematic Strategy⁸¹ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated

⁸¹ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> [accessed 20/05/19]

detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive⁸²(WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

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

Key messages from the National Planning Policy Framework⁸³ (NPPF) include:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'
- 'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, considering the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.

⁸² European Commission (2016) The EU Water Framework Directive – integrated river basin management for Europe [online] available at: http://ec.europa.eu/environment/water/water-framework/index_en.html [accessed 20/05/19]

⁸³ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 20/05/19]

- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.
- Encourage the effective use of land through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' (2018)⁸⁴ directly relates to the land, soil and water resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England (2009)⁸⁵, which sets out a vision for soil use in England. Furthermore, the Water White Paper⁸⁶ sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

In terms of waste management, the Government Review of Waste Policy in England (2011)⁸⁷ recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

The National Waste Management Plan (2013)⁸⁸ provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive⁸⁹. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

The EU Nitrates Directive (91/676/EEC) requires member states to identify areas where groundwater has nitrate concentrations of more than 50 mg/l nitrate or is thought to be at risk of nitrate contamination. These areas are designated as Nitrate Vulnerable Zones (NVZs) and as such are recognised as being at risk from agricultural nitrate pollution. Member states are required to establish Action Programmes in order to reduce and prevent further nitrate contamination.

⁸⁴ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [accessed 20/04/20]

⁸⁵ DEFRA (2009) Safeguarding our Soils: A Strategy for England [online] available at: <https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england> [accessed 20/05/19]

⁸⁶ DEFRA (2011) Water for life (The Water White Paper) [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf [accessed 20/05/19]

⁸⁷ DEFRA (2011) Government Review of Waste Policy in England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69401/pb13540-waste-policy-review110614.pdf [accessed 20/05/19]

⁸⁸ DEFRA (2013) Waste Management Plan for England [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf [accessed 20/05/19]

⁸⁹ Directive 2008/98/EC

Local

The Exeter and East Devon Water Cycle Study (2010) informs proposed growth targets in line with potential threats to the water environment, including the timely and phased introduction and maintenance of water services infrastructure. In sum, it was found that the implementation of water efficiency measures will not only reduce water demand and demand on water resources in the district, but produce associated savings in energy, financial costs and carbon emissions. Additionally, reductions in water demand can also reduce the need for additional infrastructure, resulting in further savings.

The South West River Basin Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment. It also informs decisions on land-use planning and provides baseline classification of water bodies, statutory objectives for protected areas, statutory objectives for water bodies, and a summary programme of measures to achieve statutory objectives.

The Devon Minerals Plan (2011- 2033) proposes the following key vision for the area:

- *‘For the period to 2033 and in the longer term, Devon will maintain supply of its industrial minerals of national importance to support the local and wider economies, and will continue to support its development needs by delivering the bulk of the necessary aggregate minerals from within the County, while maximising the use of its substantial secondary and recycled resources.*
- *The wider availability of characteristic building materials will allow local distinctiveness within the County to be sustained. Within geological constraints, development of strategic mineral resources will be concentrated in locations that offer the greatest level of accessibility to the major markets and growth areas within Devon and to the port network for the sustainable transportation of minerals beyond the County. This spatial pattern will also minimise the contribution of mineral development to climate change.*
- *Throughout its lifecycle, mineral development will contribute appropriately to maintaining and enhancing the living conditions of Devon’s residents and the quality of its environment.’*

At the local level, policies in the East Devon Local Plan that relate to the Land, Soil and Water Resources SEA theme include:

- Strategy 6 – Development within Built-Up Area Boundaries;
- Strategy 38 – Sustainable Design and Construction;
- EN13 – Development on High Quality Agricultural Land;
- EN16 – Contaminated Land; and
- EN18 – Maintenance of Water Quality and Quantity.

Summary of baseline

Current Baseline

The Water Framework Directive (WFD) drives a catchment-based approach to water management with a view to improving the overall water quality of watercourses in any given catchment. Clyst Honiton is located within the South West River Basin District, specifically, the Devon East Management Catchment, and the Clyst and Culm Operational Catchment. The Clyst rises in the Blackdown Hills and joins the River Exe at Topsham, whilst the Culm

converges with the main Exe near Stoke Canon, north east of Exeter. The catchment is mainly agricultural with some industry around Cullompton, Willand, and Uffculme.⁹⁰

The Clyst and Culm Operational Catchment contains 19 water bodies. With regards to water quality within the Plan area, the table below shows that 11 of the 19 water bodies within the Clyst and Culm Operational Catchment have ‘Poor’ or ‘Bad’ ecological status or potential. The most common reasons for not achieving at least ‘good’ potential include agricultural and rural land management, the water industry, industry and the domestic general public. All water bodies demonstrate at least ‘Good’ chemical status.

Table: Ecological and Chemical status of surface water bodes⁹¹

Number of water bodies	Ecological status or potential					Chemical Status	
	Bad	Poor	Moderate	Good	High	Fail	Good
19	1	10	8	0	0	0	19

The Upper part of the River Clyst (Clyst William- Exe) is the main waterbody within the Plan area, which is one of the rivers identified in the table above. The Upper Clyst is identified as having an overall ‘Poor’ ecological status, and ‘Good’ chemical status⁹². Reasons given for not achieving ‘Good’ ecological status are agriculture and rural land management and drought.

The Exeter and East Devon Water Cycle Study, 2010 (WCS) identified no absolute environmental constraints or critical infrastructure constraints to the proposed scale of growth in the Plan area. Further, it was found that there was sufficient strategic water resource availability to serve future development.

With regards to waste disposal, the Cranbrook, Skypark and the Intermodal Freight Terminal sites are connected to the main Trunk road network by the Clyst Honiton Bypass (planned as Access Strategy 1) and improvements to Junction 29 on the M5 (Access Strategy 2). The impact of development East of the M5 on infrastructure, particularly the strategic road network, will be considered holistically by East Devon Council⁹³.

Much of East Devon, including the Neighbourhood Plan area, falls within a Nitrate Vulnerable Zone (NVZ), due to risk from agricultural nitrate pollution. NVZs indicate where there are areas of surface water or groundwater that are susceptible to nitrate pollution from agricultural activities.

The Agricultural Land Classification classifies land into six Grades (plus ‘non-agricultural’ and ‘urban’), where Grades 1 to 3a are recognised as being the ‘best and most versatile’ land and Grades 3b to 5 are of poorer quality. According to the Agricultural Land Classification map for the South West of England there are some areas of excellent quality, ‘best and most versatile’ agricultural land (Grade 1) in the north of the Plan area, including

⁹⁰ Environment Agency (2016): ‘Clyst and Culm Operational Catchment’ [online] available from: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3085/Summary> [accessed 01/04/20].

⁹¹ Environment Agency (2016): ‘Clyst and Culm Operational Catchment’ [online] available from: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3085/Summary> [accessed 01/04/20].

⁹² Environment Agency (2016): ‘Upper Clyst’ [online] available from: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB108045008860> [accessed 01/04/20].

⁹³ East Devon District Council (2016): ‘Local Plan, 2013- 2031’ [online] available from: <https://eastdevon.gov.uk/media/1772841/local-plan-final-adopted-plan-2016.pdf> [accessed 20/04/20].

underlying much of Clyst Honiton village itself. The remainder of the Neighbourhood Plan area is classified as Grade 3 agricultural land of good to moderate quality.

Future Baseline

Future development has the potential to affect water quality through diffuse pollution, waste water discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.”

Due to the prevalence of Grade 1 and Grade 2 agricultural land within the undeveloped sections of the Neighbourhood Plan area, new developments which are located outside of the existing village will likely lead to losses of higher quality (best and most versatile) agricultural land.

A.7 Population and Community

Policy context

National

Key messages from the National Planning Policy Framework⁹⁴ (NPPF) include that planning policies should:

- Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
- Retain and develop accessible local services and community facilities in rural areas.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Enable and support health lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Ensure that there is a ‘sufficient choice of school places’ and taking a ‘proactive, positive and collaborative approach’ to bringing forward ‘development that will widen choice in education’.

National Planning Practice Guidance (NPPG)⁹⁵ identifies that:

- Local Planning Authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.
- Local planning authorities should secure design quality through the policies adopted in their local plans. Good design is indivisible from good planning and should be at the heart of the plan making process.

⁹⁴ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

⁹⁵ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

- A healthy community is a good place to grow up and grow old in. It is one which supports healthy behaviours and supports reductions in health inequalities. It should enhance the physical and mental health of the community.

Green infrastructure is a network of multifunctional green space, urban and rural, which can deliver a wide range of environmental and quality of life benefits for local communities. Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.

The Select Committee on Public Service and Demographic Change report *Ready for Ageing?* (2013)⁹⁶ warns that society is underprepared for the ageing population. The report says that “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report says that the housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.

Local

At the local level, policies in the East Devon Local Plan that relate to the Population and Community SEA theme include:

- Strategy 3 – Sustainable Development;
- Strategy 4 – Balanced Communities;
- Strategy 27 – Development at the Small Towns and Larger Villages;
- Strategy 29 – Promoting Opportunities for Young People;
- Strategy 30 – Inward Investment, Communication Links and Local Benefits;
- Strategy 31 – Future Jobs and Employment Land Provision;
- Strategy 32 – Resisting Loss of Employment, Retail and Community Sites and Buildings;
- Strategy 37 – Community Safety;
- RC1 – Retention of Land for Sport and Recreation;
- RC2 – New Open Space, Sports Facilities and Parks;
- RC5 – Community Buildings;
- RC6 – Local Community Facilities; and
- RC7 – Shared Community Facilities.

Summary of baseline

Current Baseline

The following data is taken from the most recent National Census (2011), available through the Office for National Statistics (ONS)⁹⁷.

⁹⁶ Select Committee on Public Service and Demographic Change (2013) *Ready for Ageing?* [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>
⁹⁷ ONS (2011): '2011 Census' [online] available to download from: <https://www.ons.gov.uk/census/2011census> [accessed 24/03/20].

The table below shows that the population of Clyst Honiton grew by 4.47% between the 2001 census and 2011 census, a lower rate of growth than East Devon (5.53%), the South West (7.31%) and England as a whole (7.88%).

Table: Population change between 2001 - 2011

	Clyst Honiton	East Devon	South West	England
2001	291	125520	4928434	49138831
2011	304	132457	5288935	53012456
Population change (%)	4.47%	5.53%	7.31%	7.88%

The table below shows that the most populous age bracket within Clyst Honiton is the 25-44 group. This is similar to the most populous age bracket for England as a whole, though is higher than figures for East Devon and the South West region. The proportion of the population in the 60+ age bracket for Clyst Honiton (24.67%) is broadly in alignment with national and regional totals (22.30% and 26.41% respectively), though notably lower than district-level totals (36.43%).

Table: Age structure

Age Band	Clyst Honiton	East Devon	South West	England
0-15	18.42%	15.44%	17.58%	18.90%
16-24	8.22%	8.54%	11.29%	11.90%
25-44	27.63%	19.44%	24.61%	27.50%
45-59	21.05%	20.14%	20.10%	19.40%
60+	24.67%	36.43%	26.41%	22.30%
Total Population	304	132457	5288935	53012456

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

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

- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
- **‘Indoors Living Environment’** measures the quality of housing.
- **‘Outdoors Living Environment’** measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
 - **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
 - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)⁹⁸ are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. Clyst Honiton falls within one LSOA: East Devon 006C. The following results indicate the comparative deprivation levels for the East Devon 006C:

- **Overall IMD** – 40% least deprived
- **Income Deprivation** – 50% least deprived
- **Employment Deprivation** – 50% least deprived
- **Education, Skills and Training** – 50% least deprived
- **Health Deprivation and Disability** – 20% least deprived
- **Crime** – 10% least deprived
- **Barriers to Housing and Services** – 30% most deprived
- **Living Environment Deprivation** – 30% most deprived
- **Income Deprivation Affecting Children** – 50% least deprived
- **Income Deprivation Affecting Older People** – 20% least deprived

In relation to the IMD 2019⁹⁹, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales. The table below highlights the degree of deprivation within the Neighbourhood Plan area and the wider region. The proportion of houses that are deprived in at least one dimension (58.33%) is higher than comparative figures for East Devon (55.56%), the South West (55.24%) and England as a whole (57.40%). Most households which are deprived, are deprived in 1 dimension (39.99%).

Table: Household Deprivation

	Clyst Honiton	East Devon	South West	England
Not Deprived				
Deprived in no dimensions	41.67%	44.44%	44.76%	42.50%
Deprived				
Deprived in 1 dimension	39.99%	35.32%	33.17%	32.70%
Deprived in 2 dimensions	14.39%	17.11%	17.59%	19.10%

⁹⁸ DCLG (2019): Indices of Deprivation Explorer' [online] available from: <http://dclgapps.communities.gov.uk/imd/ioid_index.html#> [accessed 10/03/20].

	Clyst Honiton	East Devon	South West	England
Deprived in 3 dimensions	3.79%	2.89%	4.04%	5.10%
Deprived in 4 dimensions	0.76%	0.23%	0.44%	0.50%
Total deprived	58.33%	55.56%	55.24%	57.40%

Census data presented in the figure below indicates that the population of Clyst Honiton tends to follow similar trends for their highest level of qualification in line with district level, regional and national trends. However, the proportion of residents in Clyst Honiton with no qualifications (20.56%) is slightly lower than averages for East Devon (21.07%), the South West (20.70%) and England as a whole (22.46%).

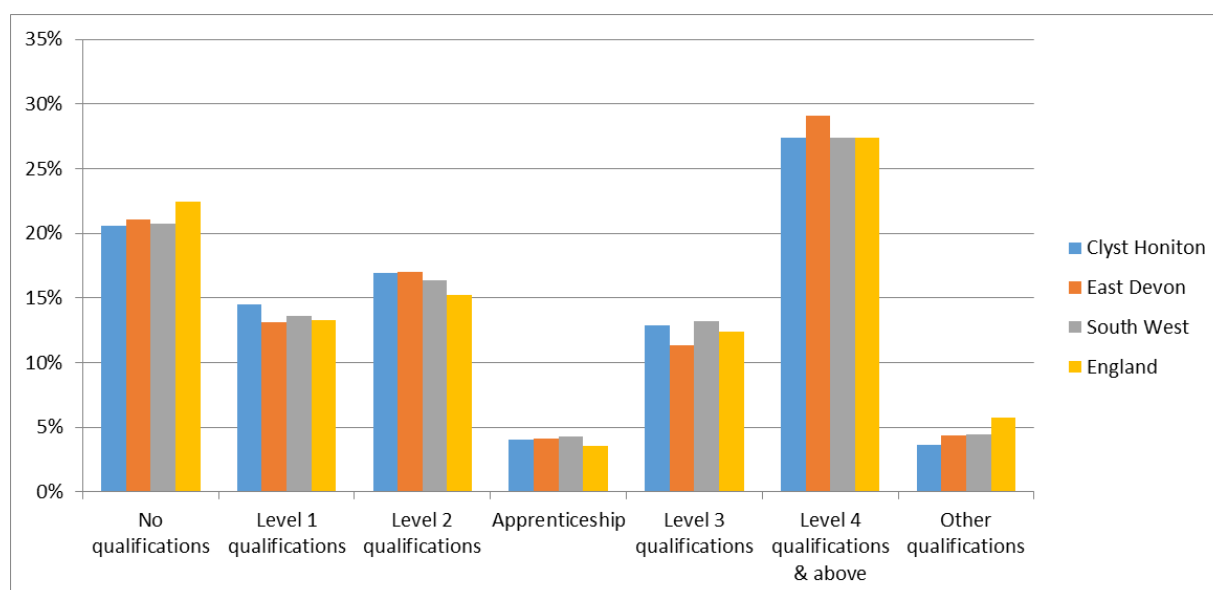


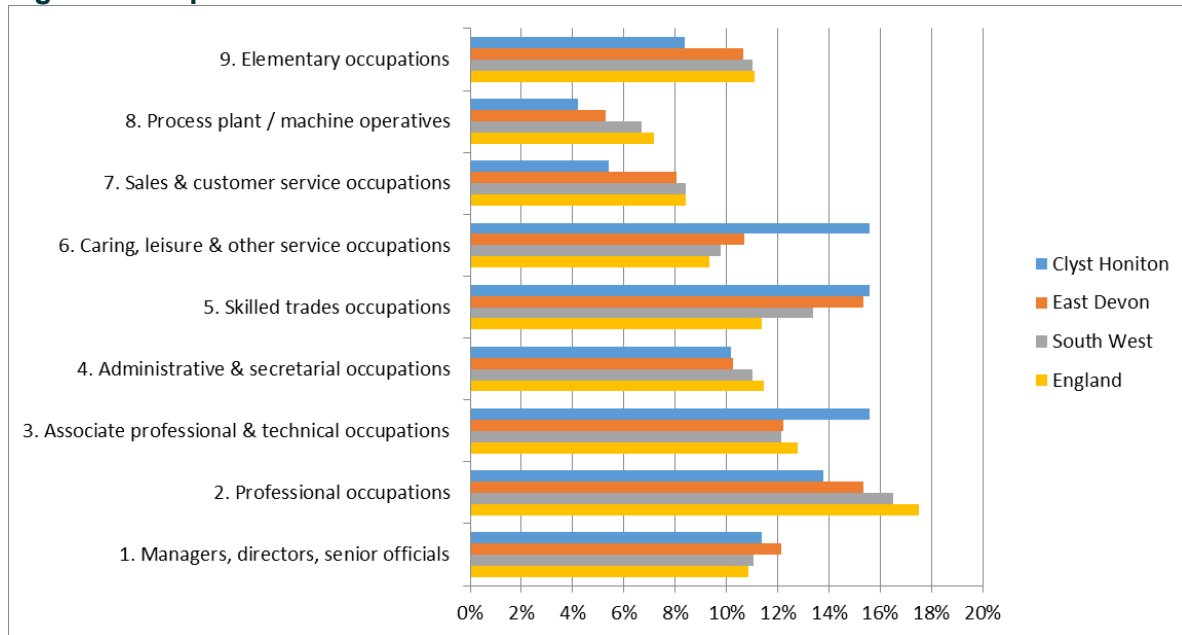
Figure: Highest Level of qualification

Regarding employment within the Neighbourhood Plan area, the following categories describe the majority of residents' occupations:

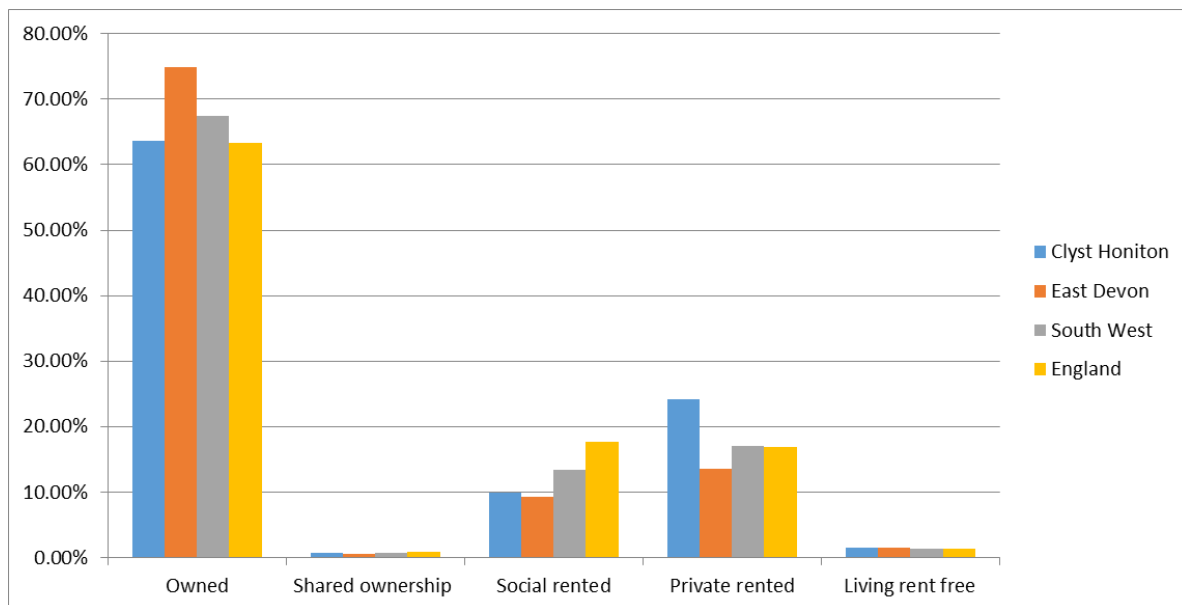
- Caring, leisure and other service occupations (15.57%)
- Skilled trades occupations (15.57%)
- Associate professional & technical occupations (15.57%)
- Professional occupations (10.18%)

The number of residents within caring, leisure and other service occupations is comparatively much higher than figures for East Devon (10.71%), the South West (9.78%) and England as a whole (9.33%). The same trend can be seen for individuals in associate professional & technical occupations. Conversely, the proportion of residents in Elementary occupations is far lower (8.38%) than the comparative proportions for the district (10.67%), region (11.03%) and country (11.10%) as a whole. This data is presented in the figure below.

Figure: Occupation



The figure below shows that the majority of residents in the Plan area own their own homes (63.64%), but less than averages for the district (74.97%) and the South West (67.43%). Notably, a larger proportion of residents privately rent their accommodation (24.24%) in comparison for averages for East Devon (13.61%), the South West (17.09%) and England as a whole (16.80%). The opposite trend can be seen for socially rented accommodation (1.52%, 1.55%, 1.41 and 1.30% respectively).



In terms of services and amenities, Clyst Honiton village has over the last ten years lost a number of community facilities, including the primary school. This is in part due strategic developments in the wider area, including the Cranbrook New Community and a lack of planning permissions in the village.

A.8 Health and Wellbeing

Policy context

National

Key messages from the National Planning Policy Framework¹⁰⁰ (NPPF) include that planning policies should:

- Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

National Planning Practice Guidance (NPPG)¹⁰¹ identifies that local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

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

The Fair Society, Healthy Lives ('The Marmot Review')¹⁰² investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*".

Local

The Devon Joint Health and Wellbeing Strategy¹⁰³ outlines the following four priorities for Devon between the period of 2020- 2035:

- Create opportunities for all
- Healthy, safe, strong and sustainable communities
- Focus on mental health
- Maintain good health for all

¹⁰⁰ MHCLG (2019) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

¹⁰¹ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/>

¹⁰² The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

¹⁰³ Devon County Council (2018): 'Devon Joint Health and Wellbeing Strategy 2018' [online] available from: <https://www.devonhealthandwellbeing.org.uk/strategies/> [accessed 26/03/20].

At the local level, policies in the East Devon Local Plan that relate to the Health and Wellbeing SEA theme include:

- Strategy 3 – Sustainable Development;
- RC1 – Retention of Land for Sport and Recreation; and
- RC2 – New Open Space, Sports Facilities and Parks.

Summary of baseline

Current Baseline

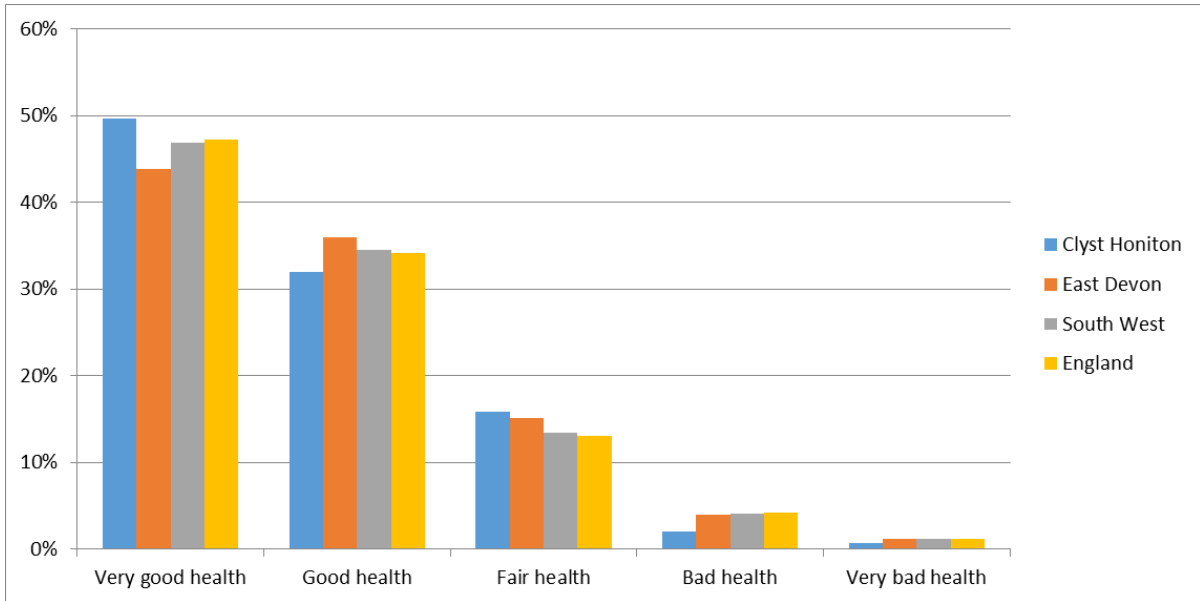
The Devon Joint Strategic Needs Assessment (JSNA)¹⁰⁴ provides an overview of the current and future health and care needs of the county population to inform and guide services within its local authorities. The following key challenges are noted in the accompanying overview document:

- A growing population particularly those in older age groups.
- More people moving into Devon compared to moving out of Devon, particularly those aged 30 to 69 years.
- Mental and behavioural disorders account for almost half of persons claiming disability benefits.
- More than 1 in 8 households in Devon in fuel poverty.
- Increased hidden risk in drugs networks, child sexual exploitation, domestic abuse, problem drinkers and drug users.
- Recent increases in child poverty.
- Poor mental health.
- Long-term conditions, multi-morbidity and frailty.

General Health within the Neighbourhood Plan area (presented in the figure below) is generally 'good' or 'very good' (81.58%), in line with national figures (81.40%) and higher than those for the district (79.81%) and region (81.42%). Those reporting 'very bad health' (0.66%) is comparatively low for district level (1.13%), regional (1.14%) and national figures (1.20%).

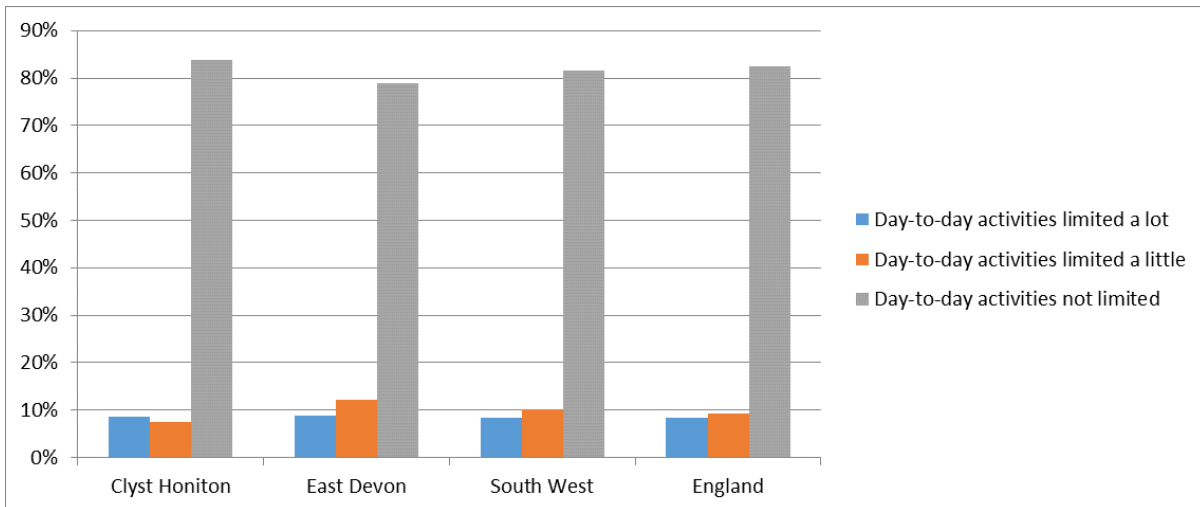
¹⁰⁴ Devon County Council (2018): 'Joint Strategic Needs Assessment' [online] available from: <https://www.devonhealthandwellbeing.org.uk/jsna/about/> [accessed 26/03/20].

Figure: General Health



The figure below shows that long term health of residents in the Neighbourhood Plan area does not generally limit their day-to-day activities (83.88%), higher than figures for East Devon (78.98%), South West (81.59%) and England as a whole (82.40%).

Figure: Long Term Health



There are no healthcare facilities within the Neighbourhood Plan area itself, in part reflecting the fact Clyst Honiton is a small settlement well connected to nearby higher tier settlements. The closest available medical facilities are located in central Exeter.

Future Baseline

Current trends in relation to health and wellbeing outcomes are unlikely to be substantially altered by limited development in Clyst Honiton, though larger scale development could potentially offer opportunities to deliver improved access to recreation and healthcare facilities.

A.9 Transportation

Policy context

National

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

Key messages from the National Planning Policy Framework¹⁰⁵ (NPPF) include:

‘Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- i. The potential impacts of development on transport networks can be addressed*
- ii. Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*
- iii. Opportunities to promote walking, cycling and public transport use are identified and pursued*
- iv. The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*

Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.’

‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be considered in both plan-making and decision-making.’

Local

At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. The Devon and Torbay third Local Transport Plan 2011- 2026 (LTP3) outlines the transport strategy for the county.

Summary of baseline

Current Baseline

The figure below shows that the majority of residents in the Neighbourhood Plan area own at least one car/van (83.00%), to a greater degree than residents across the district (79.41%), region (81.10%) and nation as a whole (74%). The majority of residents own between 1-2 vehicles (76.28%).

¹⁰⁵ MHCLG (2018) National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf [accessed 23/02/20].

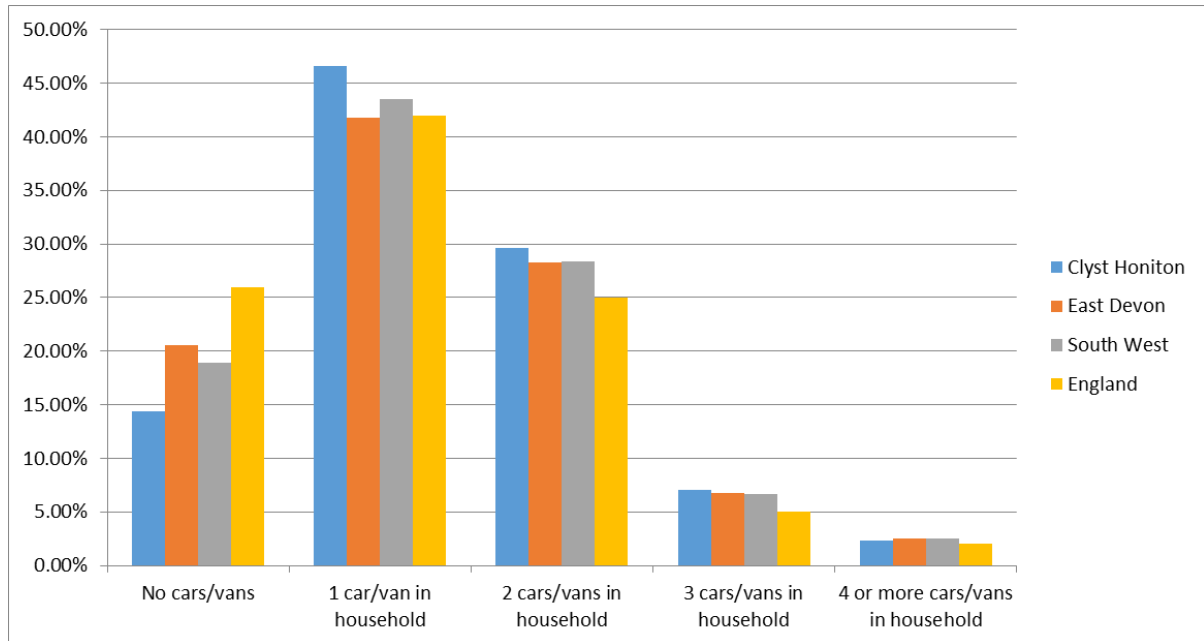
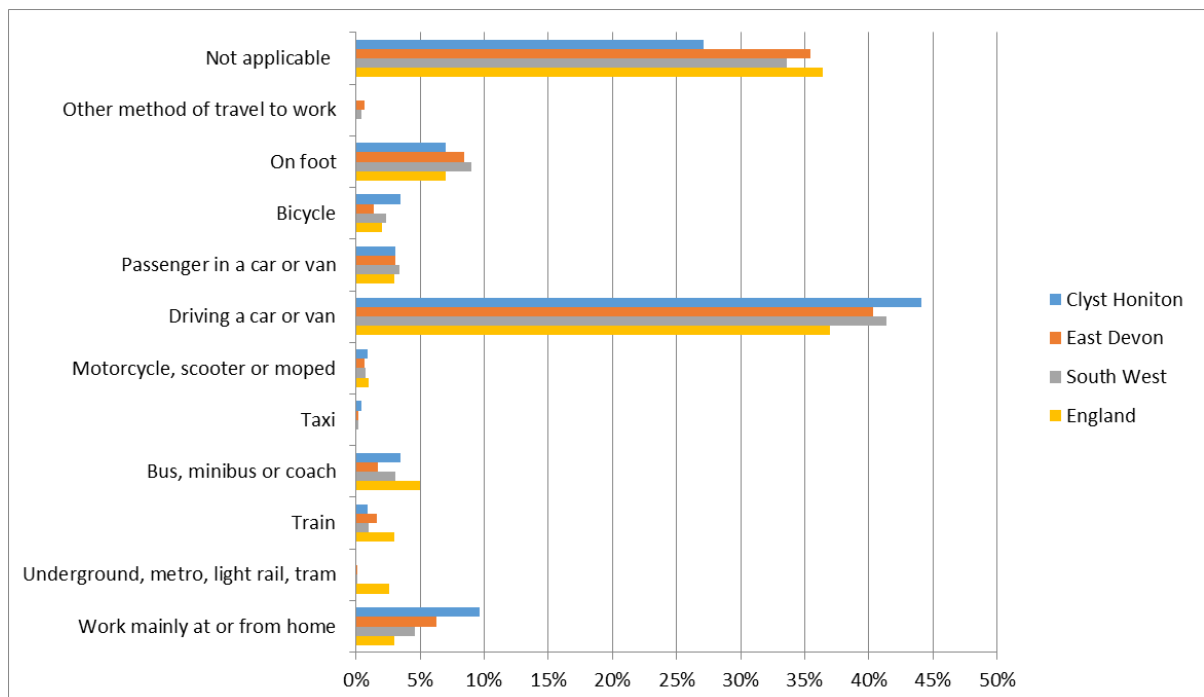


Figure: Car ownership

The figure below outlines that the most people in the Neighbourhood Plan area travel to work via car or van (44.10%), higher than comparative figures for the district (40.34%), the region (41.39%) and nation as a whole (37.00%). Additionally, the proportion of residents who travel to work by foot or bicycle is 10.48%, which is higher than figures for East Devon (9.90%), the South West (11.38%) and England as a whole (9.00%).

Figure: Method of travel to work



The closest railway station to the Neighbourhood Area is at Cranbrook, which was recently opened and is located 2.8km from the centre of Clyst Honiton village. Cranbrook railway station is located on the Exeter to Salisbury / London Waterloo line with direct services to Exeter Central (10 minutes), Honiton (18 minutes), Salisbury (1 hour 45 minutes), Basingstoke (2 hour 30 minutes) and London Waterloo (approximately 3 hours 25 minutes).

In terms of the road network, Clyst Honiton village is located adjacent to the A30, which is a main route (via the M3 and A303) from London, Hampshire and Wiltshire to Devon and Cornwall. The A30 also provides the Neighbourhood Plan area with good connections to the M5 and Exeter.

The Clyst Honiton bypass was completed in October 2013, and was constructed to link the A30 with the Skypark business park, the Intermodal Freight Terminal and the Cranbrook New Community.

Other roads within the Neighbourhood Plan area include the main high street, accessible via the B3184 roundabout, and Honiton Road. The local road network in the south of the Plan area comprises rural lanes and of lower capacity. Bishop's Court Lane provides access, running from Clyst Honiton to Clyst St Mary to the south.

Exeter International Airport borders the east of the Plan area. Approximately 2,400 public car parking spaces are provided in four car parks to the south side of the airport. As noted in the Local Plan, access roads to the airport for cyclists and walkers are of poor quality.

Clyst Honiton is well connected by bus, with frequent services from the village to Exeter (24 minutes), Cranbrook (19 minutes), Ottery St Mary (26 minutes) and Honiton (48 minutes) via Stagecoach services number 4 and 4a/4b. The village is also served by Stagecoach service number 56 to Exmouth and Exeter.

Clyst Honiton has good connections to the National Cycle Network and is connected to the east side of Exeter and Cranbrook by a traffic free route via Honiton Road and Blackhorse Lane. It is also proposed to link up the village (with Cranbrook) to the Exe Estuary Trail.

Future Baseline

Strategic scale development which takes place in the vicinity of the Neighbourhood Plan has the potential to exacerbate congestion on the road network.

The viability of additional bus and rail services may be supported by future population growth in the wider area.

An increased proportion of the village is likely to work or run a business from home in the future, with potential impacts on travel demand.

