

Strategic Environmental Assessment (SEA) for the Broadclyst Neighbourhood Plan

Environmental Report to accompany
the re-submission version of the
Neighbourhood Plan

June 2022

Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment?

A strategic environmental assessment (SEA) has been undertaken to inform the Broadclyst 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 Broadclyst Neighbourhood Plan?

The Broadclyst Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Broadclyst NP is being prepared in the context of the East Devon Local Plan, which was adopted in January 2016.

Regulation 14 consultation on a 'pre-submission' version of the Neighbourhood Plan was undertaken between December 2020 and February 2021. The Neighbourhood Plan was subsequently initially submitted to East Devon District Council in November 2021, and then re-submitted in June 2022. It is anticipated to undergo an independent examination and referendum during the second half of 2022.

Purpose of this Environmental Report

This Environmental Report, which accompanies the June 2022 re-submission version of the Neighbourhood Plan, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2020), which includes information about the Neighbourhood Plan area's environment and community. The second document was the Environmental Report which accompanied the Neighbourhood Plan for Regulation 14 consultation (December 2020). The third document was the Environmental Report which accompanied the version of the Neighbourhood Plan initially submitted in late 2021.

The purpose of this Environmental Report is to:

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

The Environmental Report contains:

- An outline of the contents and main objectives of the Neighbourhood Plan and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;

- The SEA Framework of objectives against which the Neighbourhood Plan has been assessed;
- The appraisal of alternative approaches for the Neighbourhood Plan;
- The likely significant environmental effects of the Neighbourhood Plan;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the Neighbourhood Plan; and
- The next steps for the Neighbourhood Plan and accompanying SEA process.

Assessment of alternative approaches for the Broadclyst Neighbourhood Plan

Context for growth in Broadclyst

The Broadclyst Neighbourhood Plan has been prepared in conjunction with the provisions of the East Devon Local Plan 2013 to 2031, which was adopted in 2016.

Whilst Broadclyst was identified by the Local Plan as a sustainable settlement, the Local Plan does not set a housing number for the parish to deliver in the plan period. In addition, a housing number to deliver has not been provided to Broadclyst Parish by East Devon District Council.

To gain an understanding of housing needs the parish, and to inform the development of the Neighbourhood Plan, a Housing Needs Survey was undertaken in 2017. This highlighted that there is a need for the following in Broadclyst Parish:

- 16 affordable dwellings; and
- 27 open market homes.

In light of these needs, subsequent consultation identified that there was support in the community for small or medium scale development (of up to c.24 homes) which would deliver a mix of housing types. There was also support for the delivery of mixed use development sites to deliver community uses and employment opportunities, and making use of the existing opportunity sites present in the parish. This was with a view to reinforcing the economic and community vitality of the parish, and supporting rural employment opportunities.

To deliver these aspirations, the Broadclyst Neighbourhood Plan Steering Group were keen to consider through the evolution of the Neighbourhood Plan where new development should be delivered in the parish. This was with a view to allocating sites for development through the Neighbourhood Plan to meet local needs and ambitions.

Neighbourhood Plan site assessment and initial shortlisting of sites

With a view to delivering local housing, employment and community needs in the Neighbourhood Plan area, the Neighbourhood Plan Steering Group sought to explore different options for locating new development in the parish. In response to this, a 'call for land' exercise was undertaken by Broadclyst Parish Council in 2017. This was with a view to identifying land which would potentially be available for allocation through the Neighbourhood Plan.

Following an initial sifting of the sites which came forward through the call for land exercise, 17 sites were identified as appropriate for further evaluation. To support the consideration of the suitability of the sites for potential allocations of types appropriate for the Neighbourhood Plan, each of the 17 sites underwent an independent and objective assessment in 2018 and 2019. This assessment exercise considered the sites against a range of criteria relating to suitability, availability and achievability.¹ A public consultation event was also undertaken.

Subsequent to this process, a number of the sites were shortlisted as being appropriate for further consideration as potential housing, mixed use and employment allocations for the Neighbourhood Plan.

Appraisal of shortlisted sites through the SEA process

To support the consideration of the suitability of the shortlisted sites as a potential residential or mixed use Neighbourhood Plan allocation, the SEA process has undertaken an appraisal of the key constraints and opportunities present at each of the sites and potential effects that may arise as a result of development at these locations. This SEA site appraisal was undertaken separately to the Neighbourhood Plan site assessment.

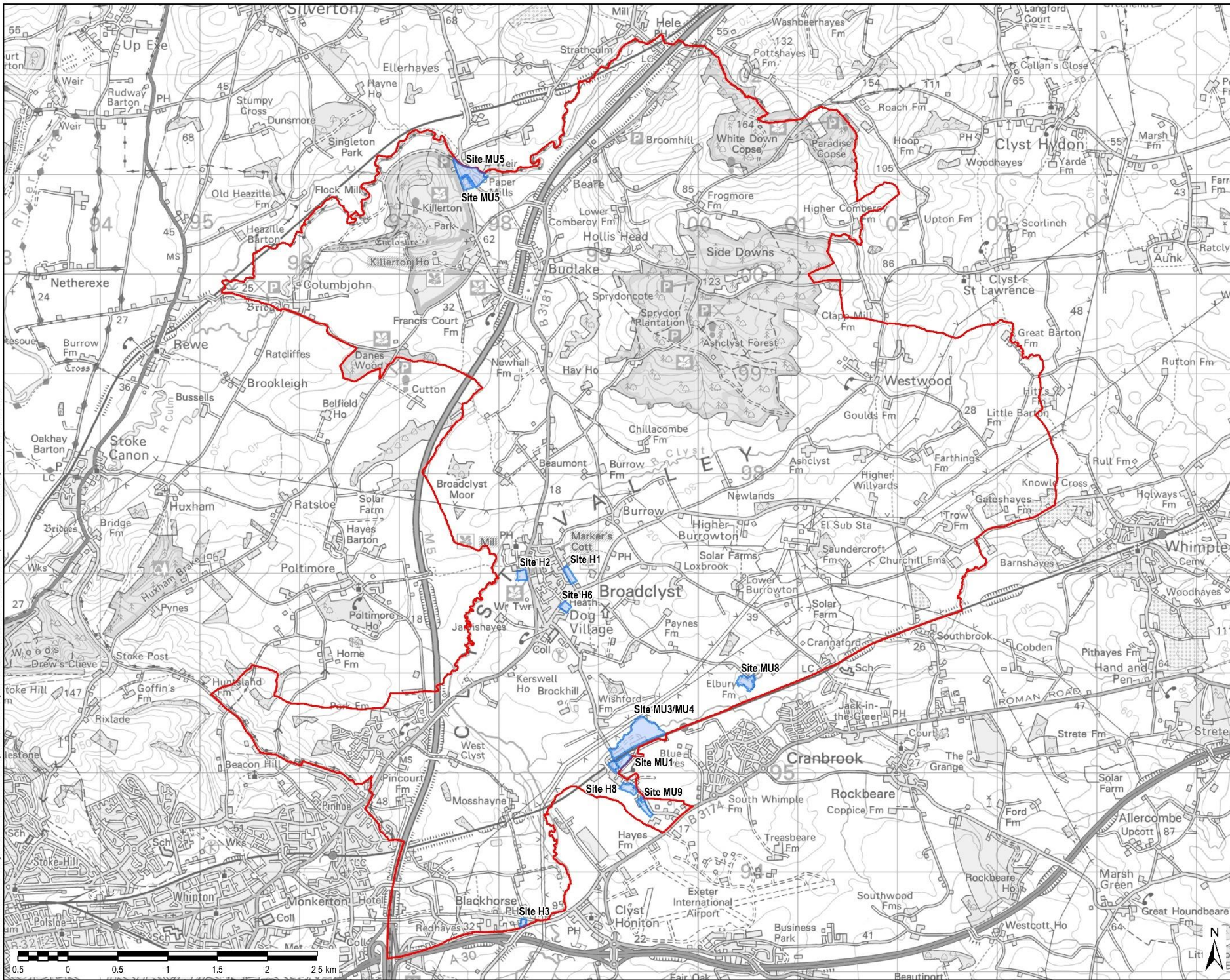
The locations of the 12 sites appraised through the SEA process are presented in the map below, with the table below summarising the findings of the assessment. Table 4.2 to Table 4.13 in the main body of this Environmental Report present full findings.

Table NTS1: Summary of SEA site appraisal findings

Site	Bio-diversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population and Community	Health and Wellbeing	Transport
MU1	Yellow	Red	Yellow	Yellow	Red	Blue	Blue	Red
MU3/MU4	Blue	Blue	Yellow	Yellow	Green	Blue	Blue	Red
MU5	Red	Red	Yellow	Red	Green	Blue	Green	Red
MU8	Yellow	Yellow	Blue	Yellow	Green	Green	Blue	Blue
MU9	Blue	Blue	Yellow	Yellow	Red	Blue	Blue	Blue
H1	Blue	Green	Red	Red	Red	Green	Green	Green
H2	Blue	Green	Red	Red	Red	Green	Green	Green
H3	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green
H6	Blue	Green	Yellow	Yellow	Red	Green	Green	Green
H8	Yellow	Blue	Blue	Yellow	Red	Blue	Blue	Blue
EC1	Blue	Blue	Yellow	Red	Green	Green	Blue	Green
EC3	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Green

Key			
Likely adverse effect (without mitigation measures)	Red	Likely positive effect	Green
Neutral/no effect	Yellow	Uncertain effect	Blue

¹ AECOM (August 2019) Broadclyst Neighbourhood Plan Site Assessment Report



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LEGEND

- Broadclyst Neighbourhood
- Plan Area
- Site Option

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Purpose of Issue **DRAFT**

Client **BROADCLYST NEIGHBOURHOOD PLAN STEERING GROUP**

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

Drawing Title **SITES ASSESSED FOR THE SEA OF THE BROADCLYST NEIGHBOURHOOD PLAN**

Drawn	Checked	Approved	Date
AW	CN	NCB	21/12/2020

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Appraisal of alternative locations for a Community Sports Hub

A key objective of the Neighbourhood Plan is to maintain and improve community facilities and provide additional community spaces for sports, leisure and recreation. To this end community engagement has indicated significant support for the delivery of a new Community Sports Hub in the parish.

In response to this, in addition to requesting proposals for land for residential, employment and mixed uses, the Call for Sites undertaken for the Neighbourhood Plan requested proposals for land to deliver a large sports facility in the parish.

The Call for Sites process brought forward three proposals for land for delivering such a facility. These are as follows:

- CSH B: Brockhill Site off Station Road
- CSH C: Clyst Vale Community College Sports Field Site
- CSH W: Wintergardens Site

To support the consideration of the suitability of the sites as a potential Neighbourhood Plan allocation for a Community Sports Hub, the SEA process has undertaken an appraisal of the key constraints and opportunities present at each of the sites and potential effects that may arise as a result of this type of development at these locations.

Tables 4.14 to 4.16 in the main body of the Environmental Report present an appraisal of the three options for a Community Sports Hub.

Preferred approach in the Neighbourhood Plan in light of appraisal findings

Choice of site allocations for housing, mixed use development, employment land and a Community Sports Hub

In light of the various appraisals undertaken for the Neighbourhood Plan, evidence base studies and the outcomes of public consultation events, the current 'pre-submission' version of the Neighbourhood Plan allocates three sites for housing. These are as follows:

Blackhorse Gardens:

Small scale development to include the following:

- Two live-work units
- Two houses.

Broadclyst Station: Site between Shercroft Close and Cotterell²:

24 residential dwellings to include the following:

- 12 affordable houses
- 5 self-build plots
- 7 open market houses

² This aligns with the Land north of Clystlands Farm site assessed above

The allocation will also include a children's play park and the provision of land for a 5m pedestrian and cycle lane for the Cranbrook to Exeter Cycle route.

Heathfield Site, Broadclyst

- 16 houses, 50% of which will be affordable.

In addition to the above, the Neighbourhood Plan seeks to regenerate three existing sites for employment uses, at Beare Farm, Crannaford and the Winter Gardens site.³

In terms of a Community Sports Hub, the Neighbourhood Plan allocates Site CSH C: Clyst Vale Community College Sports Field Site. This was allocated following a consideration of evidence base studies undertaken on the potential Community Sports Hub, including the findings of a feasibility assessment undertaken by East Devon District Council in March 2020,⁴ and the results of community engagement on the issue.

Assessment of the current version of the Broadclyst Neighbourhood Plan

The current re-submission version of the Broadclyst Neighbourhood Plan presents 39 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 submission version of the Neighbourhood Plan. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

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

The assessment has concluded that the re-submission version of the Broadclyst NP 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 and facilitating enhancements to community facilities and employment opportunities in the parish. In this context

³ The Regulation 14 consultation version of the Neighbourhood Plan also proposed an additional site allocation at the Jarvishaye site in Broadclyst village for 20 homes. Following the receipt of responses at Regulation 14 consultation, and a further consideration of the heritage constraints affecting this location, it was decided to no longer allocate this site through the Neighbourhood Plan. In addition the Regulation 14 consultation version of the plan and subsequent initial submission version of the Neighbourhood Plan included allocations for mixed use development at Elbury Farm and Silverton. These sites have been withdrawn from the present resubmission Neighbourhood Plan in order to allow extra technical work to be completed before potentially including these sites in a revised Neighbourhood Plan in the future.

⁴ East Devon District Council (March 2020) High Level Feasibility Testing: Broadclyst Neighbourhood Plan and a Multi-use Artificial Sports Pitch Proposal

the Neighbourhood Plan's proposals are considered likely to have significant potential to improve the quality of life of residents and promote community vitality.

The Neighbourhood Plan's focus on active travel enhancements, particularly in terms of facilitating strategic pedestrian and cycle network connections (including through the delivery of a new bridge over the railway line to Cranbrook) are also considered likely to lead to significant positive effects in relation to the 'Transportation' SEA theme. These active travel enhancements, alongside measures to enhance sports, recreation and leisure offer in the parish, are also considered likely to lead to long-term positive effects in relation to the 'Health and Wellbeing' SEA theme.

With regards to the 'Land, Soil and Water Resources' SEA theme, the housing allocations and new Community Sports Hub proposed through the Neighbourhood Plan will take place on greenfield land which has the potential to be classified as the best and most versatile agricultural land. This is likely to lead to the loss of productive agricultural land and minor long-term negative effects can be anticipated in this respect. The regeneration of key previously developed opportunity sites in the parish for new tourism, employment and mixed-uses will however lead to positive effects in terms of efficient land use.

In relation to the 'Climate Change' theme, the Neighbourhood Plan seeks to support the sustainable management of surface water run-off and flood risk, deliver energy efficient development, facilitate renewable energy provision and encourage sustainable transport and electric vehicle use. In terms of 'Biodiversity' SEA theme the Neighbourhood Plan has a strong focus on the protection and enhancement of the green infrastructure assets in the Plan area (including woodland areas) and seeks to facilitate enhancements to habitats and ecological networks. This includes through embedding the principle of biodiversity net gain. As such, long-term positive effects are anticipated in relation to both the 'Climate Change' and 'Biodiversity' SEA themes.

In terms of the 'Historic Environment' SEA theme, the earlier Neighbourhood Plan site allocation at Silverton Mill had the potential to have impacts on the historic environment, however, this site is no longer included as an allocation in the Neighbourhood Plan. More broadly, the historic sensitivities of the parish are recognised through the Neighbourhood Plan policies, which seek to limit adverse impacts, facilitate enhancements to the fabric and setting of heritage features, and support heritage-led regeneration of key opportunity sites.

With regards to the 'Landscape' SEA theme, whilst the greenfield development taken forward through the Neighbourhood Plan's residential allocations is likely to lead to minor negative effects on local character, the Broadclyst NP policies otherwise provide a robust basis for the protection and enhancement of landscape character in the parish.

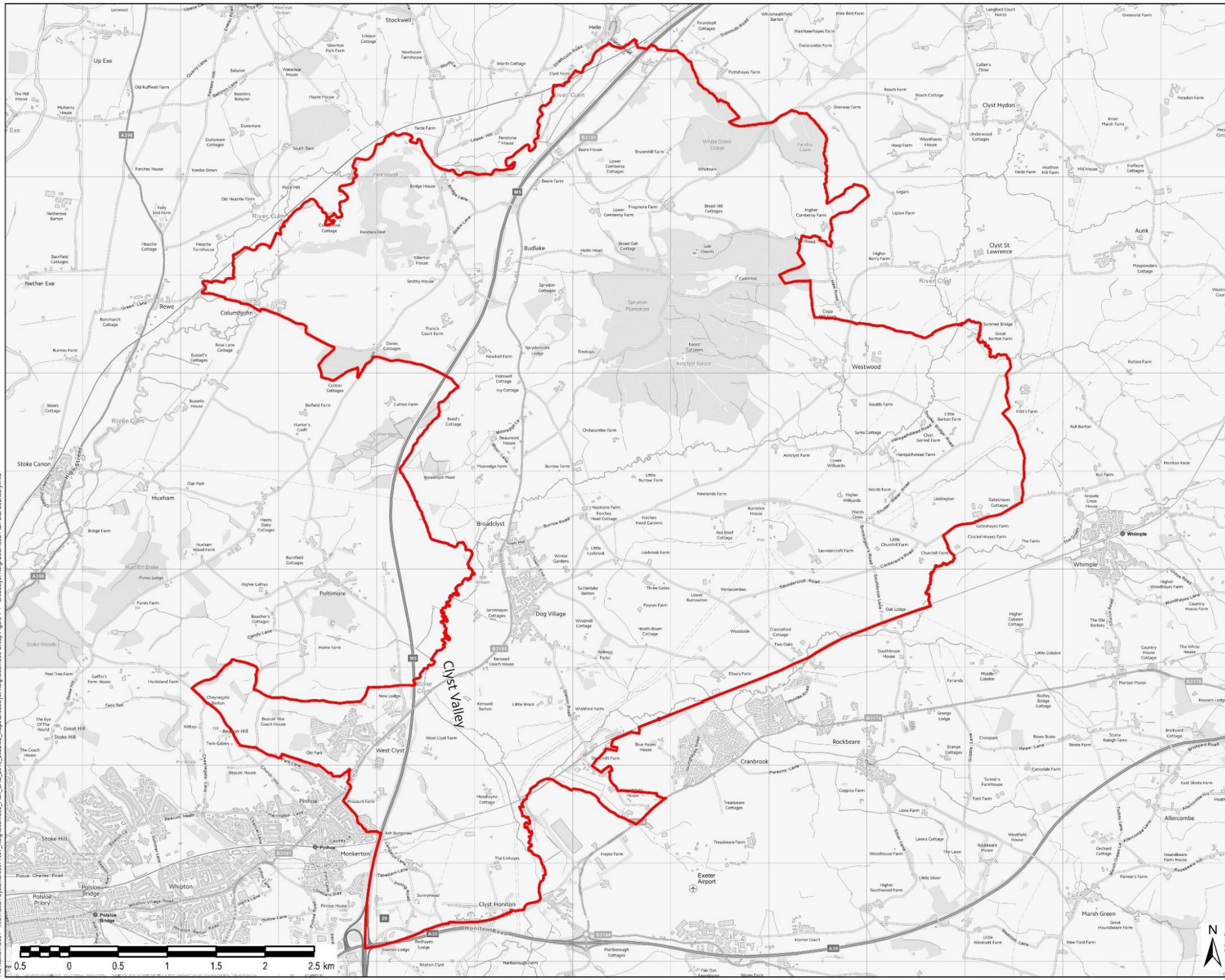
Next steps

This Environmental Report accompanies the Broadclyst Neighbourhood Plan for resubmission to the Local Planning Authority, East Devon District Council, for subsequent independent examination.

At independent examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the East Devon Local Plan.

If independent examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by East Devon District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Broadclyst Neighbourhood Plan will become part of the development plan for Broadclyst Parish.

LEGEND
 Broadclyst Neighbourhood Plan Area



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Client
BROADCLYST NEIGHBOURHOOD PLAN STEERING GROUP

Project Title
SEA OF THE BROADCLYST NEIGHBOURHOOD PLAN

Drawing Title
BROADCLYST NEIGHBOURHOOD PLAN AREA

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment on behalf of Broadclyst's emerging Neighbourhood Plan.
- 1.2 The Broadclyst Neighbourhood Plan (NP) 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 Regulation 14 consultation on a 'pre-submission' version of the Neighbourhood Plan was undertaken between December 2020 and February 2021. The Neighbourhood Plan was subsequently submitted to East Devon District Council in November 2021, and is anticipated to undergo an independent examination and referendum during the first half of 2022.
- 1.4 Key information relating to the Broadclyst NP is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Broadclyst Neighbourhood Plan

Responsible Authority	East Devon District Council
Title of Plan	Broadclyst Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	The Broadclyst Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan will be used to guide and shape development within the designated Neighbourhood Plan area and be in general conformity with the East Devon Local Plan.
Timescale	To 2031
Area covered by the plan	The Neighbourhood Plan area covers the parish of Broadclyst in East Devon (Figure 1.1)
Summary of content	The Broadclyst NP will set out a vision, objectives, strategy and range of policies to guide future development within the designated Neighbourhood Plan area. The current submission version of the Broadclyst NP allocates development sites which deliver a total of 79 new homes, including as part of mixed-use development. The Plan further proposes regeneration sites delivering new employment land and new community infrastructure.
Plan contact point	Janvrin Edbrooke, Neighbourhood Plan coordinator janvrin@broadclyst.org

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 Broadclyst NP 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) Directive⁵. It also widens the scope of the assessment from focussing on environmental issues to further consider social and economic issues.
- 1.7 The Broadclyst NP 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 (i.e. the proposed Regulation 14 consultation version of the Broadclyst NP) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 Relating to the second bullet above, an earlier version of this Environmental Report accompanied the Regulation 14 version of the Neighbourhood Plan for consultation. This Environmental Report comprises an update of the previous version to reflect changes made to the Neighbourhood Plan since Regulation 14 consultation.

Structure of this SEA Environmental Report

- 1.11 This document is the SEA Environmental Report for the Broadclyst NP 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:

⁵ Directive 2001/42/EC

Table 1.2: Questions that must be answered by the SEA Environmental Report in order to meet the regulatory⁶ requirements

Environmental Report question	In line with the SEA Regulations, the report must include...⁷
	<ul style="list-style-type: none"> • An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.
	<ul style="list-style-type: none"> • The relevant environmental protection objectives established at international or national level. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> • The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. • The environmental characteristics of areas likely to be significantly affected. • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	<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 submission version of the plan. • The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.
What happens next?	<ul style="list-style-type: none"> • The next steps for plan making / SEA process.

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

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

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

Local Plan context for the Neighbourhood Plan

- 2.1 The Broadclyst NP is being prepared in the context of the East Devon Local Plan (2013- 2031)⁸, which was adopted in January 2016. The East Devon Local Plan (EDLP) will be the principal document of the statutory development plan for the district in order to facilitate East Devon’s growth needs to 2031. The EDLP sits alongside the Village Development Plan Document (DPD)⁹, which is specifically concerned with reviewing and defining development boundaries around villages. East Devon District Council are currently considering the parameters of a Local Plan review¹⁰, however; this is at very early stages and no initial consultation on issues and options has begun at time of writing.
- 2.2 The EDLP (Strategy 27) identifies Broadclyst as within the ‘Small Towns and Larger Villages’ category of the settlement hierarchy. Settlements in this category “*vary in size and character but all offer a range of accessible services and facilities to meet many of the everyday needs of local residents and they have reasonable public transport.*” These villages “*will have a Built-up Area Boundary that will be designated in the East Devon Villages DPD though they will not have land specifically allocated for development.*” The Strategy identifies that whilst no allocations are made in the EDLP for these areas, communities can support further sustainable development through the production of Neighbourhood Plans.
- 2.3 Furthermore, the EDLP (Strategy 12 and supporting text) recognises the committed development at Cranbrook Town (adjacent to the Broadclyst Parish) for around 3,500 new homes and identifies the intention for significant expansion and development here. The neighbouring town is expected to develop as an important service centre in East Devon. It is expected that by 2031 the town will accommodate around 6,300 new homes, up to 18.4ha of new employment land, a new town centre and further supporting infrastructure. It is expected that “*development sites will not lead to settlement coalescence with Broadclyst*” (Para 7.26).
- 2.4 Policy TC8 also safeguards land required to deliver a new cycle route between Broadclyst and Exeter.

⁸ East Devon District Council (2020): ‘East Devon Local Plan 2020’ [online] available to download from: <https://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

⁹ East Devon District Council (2017): ‘Villages Plan 2017’ [online] available to download from: <https://eastdevon.gov.uk/planning/planning-policy/other-plans/villages-plan/what-is-the-villages-plan/>

¹⁰ East Devon District Council (2020) Strategic Planning Committee Report October 2020 [online] available at: <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/>

Vision, aims and objectives for the Neighbourhood Plan

2.5 The following vision statement has been developed for the Broadclyst NP:

Broadclyst is a rural parish, largely owned by the National Trust. The parish land which borders Exeter City has extensive, high density, new strategic development, which will double the number of houses within the Parish. The rest of the land is rolling green countryside with wooded hills and broad floodplains.

It has a strong sense of community and is a friendly, safe and desirable place to live and to visit. Traffic and transport infrastructure is a widespread problem, as most people travel to work outside the parish. There is a small number of business units within the parish.

Our vision is for the parish to continue to develop and thrive, meeting the changing and diverse needs of our rapidly growing community and its responsibility to tackle national and global issues including climate change, whilst preserving and enhancing our distinctive character and landscape.

2.6 To support the vision statement, the Broadclyst NP outlines 15 key aims and 59 objectives to drive and deliver the aspirations for Broadclyst. These aims and objectives are grouped under six key themes as follows:

Community Facilities

Aims:

- To provide a new Community Sports Hub.
- To maintain and improve existing community facilities.
- To provide additional community spaces for Sports, Leisure and Recreation.

Objectives:

- To protect and enhance existing community spaces, core current facilities and assets.
- To provide a new Community Sports Hub.
- To provide a new all-weather floodlit pitch.
- To assist disabled people to access sports locally.
- To increase the range of outdoor and indoor sports for the community.

Design

Aims:

- To secure high quality development which addresses the challenges of climate change.
- To integrate the built and natural environment.
- To protect historic structures, landscapes and buildings which determine the heritage character of settlements and landscapes within the Parish.

Objectives:

- To protect our heritage assets and historic landscapes in the Parish.
- To protect the historic character of Broadclyst Village and the Conservation Area.
- To encourage regeneration of historical / heritage sites so that key features are saved.
- To provide design guidance for Broadclyst Village and the small rural settlements to protect autonomy and identity.
- To ensure that design of development addresses the challenges of climate emergency.
- To support development of Passivhaus Houses and energy efficient new builds.
- To provide design frameworks to influence planning and design of new developments.
- To protect and enhance the rural character landscape of the Parish.
- To provide guidelines on the development of energy efficient buildings.
- To support refurbishment and extension of existing buildings to be more energy efficient.
- To provide design guidance on sustainable drainage.
- To support development of surface water management for existing buildings.
- To provide guidance and support for development of effective outdoor residential storage to support sustainable travel options.
- To ensure development does not have an adverse impact on the natural environment or mitigation is provided if impact is unavoidable.
- To support provision of renewable energy generation on new and existing buildings.
- To support community led renewable energy production.
- To support for district heating schemes which meet set technical conditions.

Economy and Employment

Aims:

- To expand and diversify economic development and activity within the Parish.
- To regenerate brownfield sites within the Parish.

Objectives:

- To provide new businesses in suitable locations to provide local employment opportunities.
- To support development of new buildings to provide diversification of existing farm businesses.

- To support regeneration of commercial sites to a more sustainable model of mixed-use development which brings forward substantial community benefits.
- To develop new micro-sized businesses throughout the Parish.
- To develop shared working space in the Parish.
- To develop start-up business which supports local opportunities or meets local needs.
- To expand development of tourism-based businesses.
- To support food and drink production businesses which link to the Parish farming heritage.

Housing

Aims:

- To provide housing to meet local needs.
- To increase accessibility and affordability of housing for local people.
- To increase provision of self-build and live-work units.
- To support housing that provides an identified community infrastructure need.
- To ensure new houses are in line with the NP design policies.

Objectives:

- To ensure there is a supply of affordable houses in perpetuity for local people.
- To support schemes and developments which provide a specific housing mix.
- To provide guidelines for houses to be built on sites not allocated in the BNP.
- To provide new residential and mixed development sites in the Parish.
- To provide a local connection housing criterion.
- To provide houses to meet local housing needs.
- To develop the provision of self-build properties in the Parish.
- To develop the provision of live-work units in the Parish.
- To provide identified community infrastructure need.
- To ensure houses are designed to address the design policies in the Broadclyst NP.

Infrastructure and Access

Aims:

- To enhance the movement of people and traffic in and across the Parish.
- To increase infrastructure and provision for sustainable modes of travel.

Objectives:

- To support the development of a bridge over the Waterloo Line for cyclists and pedestrians.
- To support the provision of a pedestrian and cyclist route from Broadclyst Station to Dog village.
- To support developments which combine car park provision with sustainable energy production.
- To ensure parking facilities provide charging facilities for e-bikes, scooters and electric vehicles.
- To develop a Parish wide infrastructure for E bike and car sharing schemes.
- To ensure provision of electric charging facilities for all new builds.
- To enhance and extend existing networks and create new footpaths, cycle paths, multi paths and low traffic neighbourhoods.
- To provide cycle/ footpaths to the Killerton Estate centres and a cycle network to link the centres together.
- To support and expand a sustainable electric transport network across the Parish, to include associated businesses, parking and recharging facilities.
- To provide signage to facilitate access to active travel.

Natural Environment

Aims:

- To protect and enhance the natural environment and diverse habitats of the Parish.
- To protect and enhance the landscape setting of the Parish.
- To ensure development provides a net biodiversity gain

Objectives:

- To protect existing habitat areas and protect and enhance biodiversity.
- To provide a tree replacement scheme to enhance tree cover in the Parish.
- To protect woodlands and significant trees.
- To improve natural flood management of rivers to reduce impact of flooding throughout the Parish.
- To provide support for the development of flood defence schemes.
- To protect and enhance hedgerows.
- To allocate an orchard as a local green community space.
- To protect, enhance and allocate local green spaces that have community access.
- To allocate and protect wildlife corridors and green corridors.

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.¹¹ These authorities were consulted on the scope of the Broadclyst NP 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, Operations Delivery, Consultations Team	
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Comment noted.
If the policies or proposals within the neighbourhood plan are likely to give rise to recreational disturbance, mitigation will be required to safeguard the Exe Estuary SPA/Ramsar and the East Devon Pebblebed Heaths SAC.	Comment noted.

¹¹ 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

The local planning authority has developed a strategic solution to address the issue of recreational disturbance on protected sites. We therefore recommend that you discuss this with the local planning authority as this will need to be addressed within a Habitats Regulations Assessment.

Comment noted and fed back to Neighbourhood Plan team.

Historic England

David Stuart, Historic Places Adviser, South West

Thank you for your consultation on the SEA Scoping Report for the emerging Broadclyst Neighbourhood Plan. We would recommend the inclusion of references to our guidance on relevant themes, as per your parallel consultation to us on the SEA Scoping Report for Clyst Honiton and our recent response. These can be found at:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

Otherwise, we have no additional comments to offer.

Comment noted. The context review has been updated in Appendix A.

Environment Agency

Harriet Fuller, Planning Advisor, Sustainable Places

Consultation response

How the response was considered and addressed

Thank you for your consultation of 28 May 2020 providing us with the opportunity to comment in respect of the Broadclyst Neighbourhood Plan SEA/HRA Scoping opinion.

Comment noted.

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.

Please note, this is a standard response. If you consider the plan will result in significant environmental effects please re-consult us.

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 the eight SEA themes.

Biodiversity

- The nearby Exe Valley SPA and East Devon Pebblebeds SAC are key features of biodiversity sensitivity which have potential to be affected by development within the Neighbourhood Plan area. However, the Clyst Valley Regional Park, which intersects with the Plan area, provides strategic scale SANGs to mitigate recreational impacts from development.
- There are eight County Wildlife Sites within the plan area.
- There are a variety of developmental control species within the plan area requiring safeguarding due to their ecological value.
- Key habitats identified within the area include nationally protected woodland and orchards.
- The Devon Biodiversity Report identifies a large number of Other Sites of Wildlife Interest (OSWI) and Unconfirmed Wildlife Sites (UWS) which possess significant wildlife interest within the local context.
- Invasive species present within the plan area may require removal. In such instances, an investigation into biodiversity net gain principles may be used to inform financial decisions for this process, enabling an overall enhancement to the plan area.

Climate Change

- Broadclyst is partially affected by Flood Zone 3, the highest fluvial flood risk zone. However, areas of risk are confined to corridors of land adjacent to the plan area's main watercourses: the River Clyst in the northern/central region, and the River Culm in the north west. Surface water flood risk affects a broader extent of the plan area, spanning across the network of tributaries that stem from the River Clyst.
- Emissions 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.

Landscape

- The Neighbourhood Plan area falls within the Devon Redlands NCA (148), and the Clyst Lowlands Farmland LCT, with classically rural features, including hilly landscapes, large woodlands and mixed farming. There is potential for new development to support the distinctive characteristics of these landscapes.
- Local features of the Plan area include its characteristic Devonshire rural villagescape, bordering National Trust land alongside the River Clyst. Of particular local significance is the Killerton Estate and its accompanying setting.

Historic Environment

- Broadclyst has a rich historic environment resource. There are 141 listed buildings within the Plan area, of which two are listed as Grade I, eight as Grade II*, and 128 as Grade II. Further to this, the Broadclyst Conservation Area covers the historic core of the village.
- Killerton Estate (Grade II*) is listed as a large registered park and garden, situated within the north west of the Plan area. Additionally, the house itself is of high local significance, and home to two scheduled monuments.
- There are a large variety of non-designated historic environment features within the Neighbourhood Plan area. Whilst there is a notable cluster of these features in Broadclyst village's historic core, a significant number of non-designated historic features are present across the wider Plan area.

Land, Soil and Water Resources

- 11 water bodies, including the River Clyst and River Culm, which run through the north west side of the plan area, demonstrate at least 'bad' ecological status
- The north western side of the Neighbourhood Plan area is underlain by 'excellent quality' best and most versatile agricultural land (Grade 1).

- The entirety of the plan area falls within an NVZ.

Population and Community

- The predominant group within the population are over the age of 44 (51.15%), which has the potential to lead to an ageing population in the medium-to-long term.
- There are a number of community services and facilities which serve the Plan area and particularly Broadclyst village itself. There could potentially be opportunities to deliver further services and facilities through the development process or to link new development with existing facilities through provision of new or enhanced sustainable transport infrastructure.

Health and Wellbeing

- Current markers for health within the plan area indicate that general health in Broadclyst is stronger than for East Devon more widely. The region itself is served by its' own healthcare facility in the form of a doctor's surgery.

Transportation

- Accessibility is constrained in some parts of the parish by low capacity rural lanes and poor access to public transport services.
- There are opportunities for enhanced linkages with the emerging Clyst Valley Trail network to be delivered.

SEA Framework

3.6 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 Broadclyst NP is presented below.

Table 3.2: SEA framework for the Broadclyst Neighbourhood Plan

SEA theme	SEA objective	Assessment Questions. Will the proposal/option ...
Biodiversity	Protect and enhance all biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.	<ul style="list-style-type: none"> • Protect and enhance the integrity of the County Wildlife Sites within the Plan area, including supporting habitats and mobile species that are important to the integrity of the site? • Protect and enhance developmental control species of identified ecological value? • Protect and enhance priority habitats and species, particularly the extensive areas of natural woodland and orchards? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks?
Climate change	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Avoid development in areas at risk of flooding, taking into account 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)?
	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan 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?

SEA theme	SEA objective	Assessment Questions. Will the proposal/option ...
Landscape	Protect and enhance the character and quality of landscapes and villagescapes.	<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, including the area surrounding the Killerton estate? • 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 Plan area?
Historic environment	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? • Conserve and enhance non-designated assets with local historic value within the plan area?
Land, soil and water resources	Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Avoid/ minimise any losses of best and most versatile agricultural land (Grades 1 to 3a)? • Manage mineral and waste resources in a sustainable manner? • Avoid the unnecessary sterilisation of mineral resources? • Ensure development does not hinder future access to mineral resources?

SEA theme	SEA objective	Assessment Questions. Will the proposal/option ...
	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?
Population and community	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<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? • Improve the availability and accessibility of basic amenities, including specialist services?
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<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?

SEA theme	SEA objective	Assessment Questions. Will the proposal/option ...
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.	<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?
Transportation	Promote sustainable transport use and reduce the need to travel	<ul style="list-style-type: none"> • 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 Broadclyst Neighbourhood Plan

Introduction

- 4.1 In accordance with the SEA Regulations, the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the Broadclyst Neighbourhood Plan has been informed by an assessment of alternative locations for development in the Neighbourhood Plan area.
- 4.3 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area, including potential locations for development.

Overview of plan making / SEA work undertaken since 2017

- 4.4 The Neighbourhood Plan area was formally designated by East Devon District Council in July 2017.
- 4.5 Significant public consultation has been carried out since then to support the preparation of the Neighbourhood Plan. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included events, household questionnaires, meetings, open days, community surveys, and engagement through the Neighbourhood Plan website.

Housing numbers to deliver through the Neighbourhood Plan

- 4.6 As discussed in **Chapter 2**, the Broadclyst Neighbourhood Plan has been prepared in conjunction with the provisions of the East Devon Local Plan 2013 to 2031, which was adopted in 2016.
- 4.7 Strategy 27 of the Local Plan "Development at the Small Towns and Larger Villages" identifies Broadclyst as a sustainable settlement that offers a range of facilities and services to meet many of the everyday needs of residents. The East Devon Village Plan 2018, which was adopted in July 2018 and

accompanies the main Local Plan document, subsequently defined a built-up area boundary (BUAB) around Broadclyst village.

- 4.8 Whilst Broadclyst was identified by the Local Plan as a sustainable settlement, the Local Plan does not set a housing number for the parish to deliver in the plan period. In addition, a housing number to deliver has not been provided to Broadclyst Parish by East Devon District Council.
- 4.9 To gain an understanding of housing needs the parish, and to inform the development of the Neighbourhood Plan, a Housing Needs Survey was undertaken in 2017. This highlighted that there is a need for the following in Broadclyst Parish:
- 16 affordable dwellings; and
 - 27 open market homes.
- 4.10 In light of these needs, subsequent consultation identified that there was support in the community for small or medium scale development (of up to c.24 homes) which would deliver a mix of housing types. There was also support for the delivery of mixed use development sites to deliver community uses and employment opportunities, and making use of the existing opportunity sites present in the parish. This was with a view to reinforcing the economic and community vitality of the parish, and supporting rural employment opportunities.
- 4.11 To deliver these aspirations, the Broadclyst Neighbourhood Plan Steering Group were keen to consider through the evolution of the Neighbourhood Plan where new development should be delivered in the parish. This was with a view to allocating sites for development through the Neighbourhood Plan to meet local needs and ambitions.

Assessment of alternative options for site allocations

Neighbourhood Plan site assessment and initial shortlisting of sites

- 4.12 With a view to delivering local housing, employment and community needs in the Neighbourhood Plan area, the Neighbourhood Plan Steering Group sought to explore different options for locating new development in the parish. In response to this, a 'call for land' exercise was undertaken by Broadclyst Parish Council in 2017. This was with a view to identifying land which would potentially be available for allocation through the Neighbourhood Plan.
- 4.13 Following an initial sifting of the sites which came forward through the call for land exercise, 17 sites were identified as appropriate for further evaluation. To support the consideration of the suitability of the sites for potential allocations of types appropriate for the Neighbourhood Plan, each of the 17 sites underwent an independent and objective assessment in 2018 and 2019. This assessment exercise considered the sites against a range of criteria relating to suitability, availability and achievability.¹² A public consultation event was also undertaken.

¹² AECOM (August 2019) Broadclyst Neighbourhood Plan Site Assessment Report

4.14 Subsequent to this process, a number of the sites were shortlisted as being appropriate for further consideration as potential housing or mixed use allocations for the Neighbourhood Plan.¹³

Appraisal of shortlisted sites through the SEA process

4.15 To support the consideration of the suitability of the shortlisted sites as a potential residential, mixed use or employment land Neighbourhood Plan allocation, the SEA process has undertaken an appraisal of the key constraints and opportunities present at each of the sites and potential effects that may arise as a result of development at these locations.

4.16 The 12 sites which have been appraised through the SEA process are listed in **Table 4.1** below, with the locations of these sites presented in **Figure 4.2**.

Table 4.1: Sites appraised through the SEA process

Site ID. ¹⁴	Name of site, address	Size (ha) ¹⁵
MU1	Land off Station Road	1.5 ha
MU3/MU4	Land at Lodge Trading Centre	6.7 ha
MU5	Silverton Mill	4.1 ha
MU8	Elbury Farm	1.7 ha
MU9	Land south of Clystlands Farm	2.4 ha
H1	Land to the east of Town End	1 ha
H2	Land at Jarvishayes Farm	0.95 ha
H3	Blackhorse Gardens	0.45 ha
H6	Land at Heathfield	0.8 ha
H8	Land north of Clystlands Farm	3.1 ha
EC1	Beare Farm	0.58 ha
EC3	Winter Gardens	0.54 ha

¹³ The remaining sites were withdrawn from consideration by the landowner or were deemed no longer available.

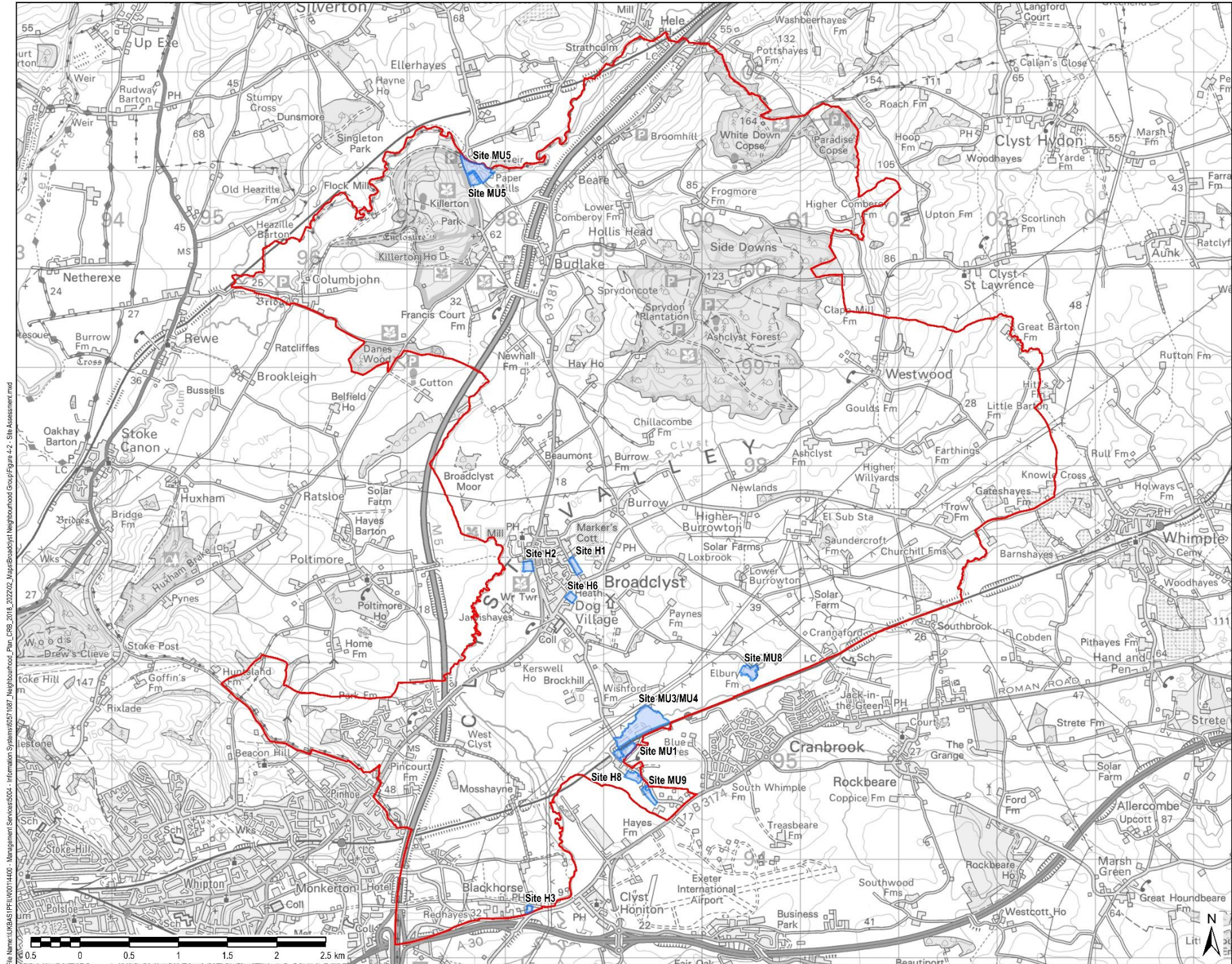
¹⁴ Site IDs have been taken from the Site Options Assessment Report.

¹⁵ Represents total site size and not necessarily total developable area.

Approach to the appraisal and findings

- 4.17 Through the SEA site appraisal, each of 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 appraisal was undertaken separately to the site assessment undertaken on behalf of the Broadclyst Neighbourhood Plan Steering Group in 2018/19.
- 4.18 Sources of information to support the site appraisal process has included (amongst others): OS Maps, MAGIC Interactive Map, Flood Risk Maps for England, Regional Agricultural Land Classification maps, reports and interactive mapping layers available on Devon County Council's website.¹⁶ These sources are referenced within the baseline information presented in **Appendix A** of this Environmental Report.
- 4.19 **Tables 4.2 to 4.11** below present the findings of the appraisal and provide an indication of each site's sustainability performance in relation to the eight SEA themes.

¹⁶ Devon Environment Viewer: <http://map.devon.gov.uk/dccviewer/>



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LEGEND

- Broadclyst Neighbourhood
- Plan Area
- Site Option

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Purpose of Issue **DRAFT**

Client **BROADCLYST NEIGHBOURHOOD PLAN STEERING GROUP**

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

Drawing Title **SITES ASSESSED FOR THE SEA OF THE BROADCLYST NEIGHBOURHOOD PLAN**

Drawn AW	Checked CN	Approved NCB	Date 21/12/2020
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Drawing Number **FIGURE 4.2**

File Name: MU2451\FE\U00141400 - Management Services\504 - Information Systems\81571087_Neighbourhood_Plan_C98_2018_2022\02_A3SEAforBroadclyst_Neighbourhood_Group\Figure 4.2_Site Assessment.mxd




Table 4.2: MU1, Land off Station Road

SEA theme	Commentary: MU1, Land off Station Road
	
	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. However, given development of the site would deliver a lower number of homes than this IRZ threshold, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>The site itself does not have significant biodiversity value, and no areas of Biodiversity Action Plan (BAP) Priority Habitat are present on the site. An area of deciduous woodland BAP Priority Habitat is located across the road on the opposite side of Station Road. Whilst direct impacts on the woodland from landtake and fragmentation are not anticipated, some limited disturbance may take place from new development at this location from noise, light pollution or trampling from enhanced access. However, these impacts are unlikely to be significant.</p>
	<p>Climate Change</p>
<p>Landscape</p>	<p>The site is at low sensitivity regarding landscape character and visual impact. This is because the site is well screened and part of the site is already developed. The undeveloped area comprises most of the site, but development at this location would have a minimal visual impact on the wider landscape.</p>

¹⁷ <https://flood-map-for-planning.service.gov.uk/>

SEA theme	Commentary: MU1, Land off Station Road	
Historic Environment	<p>The site is not within the setting of a conservation area. No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site. No features on or adjacent to the site are listed on the Devon Historic Environment Record (HER).</p>	
Land, Soil and Water Resources	<p>The site is a mixture of greenfield and previously developed land. The area of greenfield land (which covers the majority of the site) comprises Grade 2 agricultural land, which comprises very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting. Development on this part of the site would lead to the loss of this land.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>Given existing links, the site is not readily accessible from key day-to-day services and facilities in Cranbrook and Broadclyst. This will increase the need for residents to travel to facilities located in these locations.</p>	
Health and Wellbeing	<p>The site is located 1.8km from Cranbrook Medical Centre. The locality is not linked to an extensive Public Rights of Way network comprising footpaths or bridleways.</p>	
Transportation	<p>The site is not located in close proximity to community facilities and services. This will increase the need to travel. The nearest bus stops and cycle routes are approximately 950m away along London Road. This may discourage the use of sustainable modes of transport to the services and facilities located in Cranbrook and further afield (including Exeter).</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.3: MU3/MU4, Land at Lodge Trading Centre

SEA theme	Commentary: MU3/MU4, Land at Lodge Trading Centre
Biodiversity	 <p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. Given the size of the site, which could deliver significantly more than this number of homes, any development of this scale would be required to come forward in consultation with Natural England.</p> <p>The site itself does not have significant biodiversity value, and no areas of BAP Priority Habitat are present on the site. However, a large area of coastal and floodplain grazing marsh BAP Priority Habitat is located across the lane to the north. Whilst direct impacts on the habitat from landtake and fragmentation are not anticipated, some limited disturbance may take place from new development at this location from noise, light pollution or trampling from enhanced access. However, these impacts are unlikely to be significant, particularly given the current employment uses on 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 parish and an intensification of uses at this location.</p> <p>The site is at relative distance from key day-to-day services and facilities in Cranbrook and Broadclyst via existing transport links. This will impact on greenhouse gas emissions from transport by increasing the need to travel to such amenities.</p> <p>According to the Flood Map for Planning, a limited part of the northern edge of the site is at ‘high’ risk of fluvial flooding. This means that each year this area has a chance of flooding of greater than 3.3%. Most of the site is not within a flood risk zone however. The site is not at significant risk of surface water 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>




SEA theme	Commentary: MU3/MU4, Land at Lodge Trading Centre	
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>According to the Devon HER, the eastern edge of the site overlaps with the site of an early Iron Age to Roman feature listed as “A roughly circular ditched enclosure of probable later prehistoric to Roman date was visible as a cropmark in the floodplain of the River Clyst on aerial photographs of 1966, north-west of Blue Hayes House, Broad Clyst.” The site has however since been developed for employment land.</p>	
Land, Soil and Water Resources	<p>The sites comprise a previously developed employment site. As such, development at this location would support the efficient use of land.</p> <p>In terms of the water environment, the northern site boundaries are located alongside the Lower Cranny Brook. In 2019 the water quality of the watercourse was established by the Environment Agency as follows: ecological quality, ‘moderate’; and chemical water quality, ‘fail’. Given existing employment uses, change of use of the site may offer opportunities to support wider water quality improvements on the watercourse. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>Given existing links, the site is not readily accessible from day-to-day services and facilities in Cranbrook and Broadclyst. This will increase the need for residents to travel to key amenities.</p>	
Health and Wellbeing	<p>The site is located 1.8km from Cranbrook Medical Centre.</p> <p>The locality is not linked to an extensive Public Rights of Way network comprising footpaths or bridleways.</p>	
Transportation	<p>The site is not in located with good accessibility to community facilities and services via non-car modes, and the nearest bus stops are approximately 1.2km away along London Road. This is less likely to encourage the use of sustainable modes of transport as an alternative to the private car.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

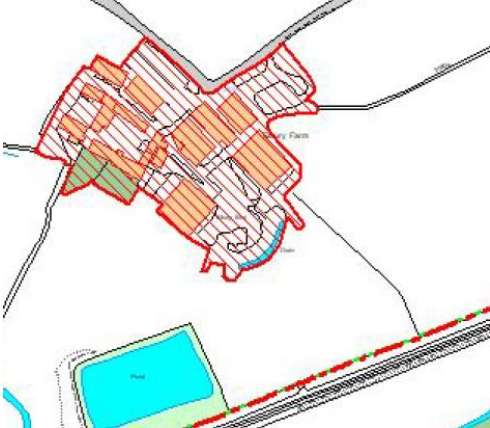
Table 4.4: MU5, Silverton Mill

SEA theme	Commentary: MU5, Silverton Mill
Biodiversity	 <p>The site is adjacent to the Killerton SSSI (which is also a County Wildlife Site), with the site within an SSSI IRZ for ‘all planning applications – except householder applications’. Highlighting potential effects on the integrity of the SSSI, consultation with Natural England on all development proposals would be required if the site were to be taken forward.</p> <p>An area of deciduous woodland BAP Priority Habitat is located adjacent to the site to the east. Whilst direct impacts on the woodland from landtake and fragmentation are not anticipated, disturbance may take place from new development at this location from noise, light pollution or trampling from enhanced access.</p>
	<p>Development of the site will lead to inevitable increases in greenhouse gas emissions from an increase in the built footprint of the parish and an intensification of uses at this location.</p> <p>The site is at distance from key day-to-day services and facilities in Silverton. This will impact on greenhouse gas emissions from transport by increasing the need for residents to travel to such amenities.</p> <p>Flood risk on the site is associated with the presence of the River Culm. According to the Flood Map for Planning, the north eastern part of the site is at ‘high’ risk of fluvial flooding. This means that each year this area has a chance of flooding of greater than 3.3%. There are some limited areas on the site at risk of surface water flooding.</p>
Climate Change	<p>The site is in an area of high historic landscape sensitivity given the presence of the Grade II* listed Killerton House registered park and garden located to the west.</p> <p>Whilst impacts on historic character have the potential to be significant given the sensitivity of the location for the historic environment (see ‘Historic Environment’ SEA theme below), visual impacts on surrounding landscape character will be relatively limited given existing screening present on and around the site.</p>

SEA theme	Commentary: MU5, Silverton Mill
Historic Environment	<p>The site has significant historic environment sensitivity.</p> <p>The site is on the opposite side of the lane to the Grade II* listed registered park and garden of Killerton House. This comprises an early C19th woodland garden and pleasure ground associated with the Veitch family, with an early C20th terrace designed by William Robinson adjacent to the house, set within wider parkland which developed from the late C17th. Ellerhayes Bridge, which is a Grade II* listed structure, is located on the north west corner of the site. This comprises a C15th road bridge over the River Culm, with later alterations and repair.</p> <p>Whilst development on the Silverton Mill site would be unlikely to affect the fabric of these features and areas of heritage value, inappropriate development may lead to adverse impacts on their settings.</p> <p>The site is not within the setting of a conservation area.</p> <p>A number of features present on the site are listed on the Devon HER and described as follows:</p> <ul style="list-style-type: none"> • MDV65051: The 'cottage office block' at Silverton Mill was originally built as a C17th three cell cross passage house which has had many alterations but retains several early features. • MDV7364: A stone barn at the Silverton Paper Mills was converted into a chapel by the owner of the works in 1893 and rented to the Wesleyans. It closed in 1964. • MDV65052: 'Lindores' + 'Chapel Cottage' at Silverton Mill are a pair of C19th two storey cottages which were originally part of a group of farm buildings serving what is now the 'cottage office block' at the mill. • MDV65048: 'Bridge house' at Silverton Mill is a two storey house built in 1828.
Land, Soil and Water Resources	<p>The site comprises a previously developed site. As such, development at this location would support the efficient use of land.</p> <p>In terms of the water environment, the site adjoins the River Culm. In 2019 the water quality of the Lower Culm was established by the Environment Agency as follows: ecological quality, 'moderate'; and chemical water quality, 'fail'. The site does not overlap with a groundwater source protection zone (SPZ).</p> <p>The site does not overlap with a groundwater source protection zone (SPZ).</p>
Population and Community	<p>The site is not readily accessible to key day-to-day services and facilities; the nearest are located in Silverton, which is located 3.5km distant. This will undermine accessibility to key amenities. As such, 'standard' residential uses may not be appropriate for the location (although other uses, including associated with Killerton House, may be appropriate).</p>


SEA theme		Commentary: MU5, Silverton Mill	
Health and Wellbeing	<p>The site is located at some distance (approximately 3.5km) from Wyndham House Surgery in Silverton.</p> <p>The site is well connected to high quality Public Rights of Way network, including associated with Killerton House. This will support recreational and leisure opportunities.</p>		
Transportation	<p>The site is not connected by frequent public transport links and is not readily accessible to key services and facilities. As such, any development at this location is likely to encourage car use.</p>		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.5: MU8, Elbury Farm

SEA theme	Commentary: MU8, Elbury Farm
Biodiversity	 <p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. However, given development of the site would deliver a lower number of homes than this IRZ threshold, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>The site itself does not have significant biodiversity value, and no areas of BAP Priority Habitat are present on or in the vicinity 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 parish 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>In terms of emissions from transport, the site is in good proximity to the services and facilities of Cranbrook, which is approximately 500m away. However, it should be noted that Cranbrook is located on the opposite side of the railway line, and there are currently no direct walking or cycling routes to the settlement from the site.</p> <p>The site is not at risk from fluvial or surface water flooding.</p>
Landscape	<p>The site comprises a mix of traditional and modern agricultural buildings together with farmhouse and cottages currently serving an established agricultural unit. Although the site is visible within the surrounding landscape (particularly from the north), the site is already developed and therefore already influences the character of the landscape.</p>

SEA theme	Commentary: MU8, Elbury Farm	
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>According to the Devon HER, the south eastern edge of the site overlaps with the site of an orchard listed as “The remains of an area of probable post-medieval to 19th and 20th century ridges made for fruit tree planting and drainage were visible as earthwork banks to the south-east of Elbury Farm, Broadclyst, on aerial photographs of the 1940s onwards and digita.” This does not cover a significant part of the site however.</p>	
Land, Soil and Water Resources	<p>The site, whilst not greenfield, comprises a mix of traditional and modern agricultural buildings together with farmhouse and cottages currently serving an established agricultural unit. As such development of the site would not lead to the loss of productive agricultural land.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Allocation of the site would contribute positively towards meeting local housing needs, including potentially through the delivery of affordable housing.</p> <p>The site is in good proximity to the services and facilities of Cranbrook, which is approximately 500m away. However, it should be noted that Cranbrook is located on the opposite side of the railway line, and there are no direct walking or cycling routes to the settlement from the site.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Cranbrook Medical Centre.</p> <p>The locality is not currently linked to an extensive Public Rights of Way network comprising footpaths or bridleways.</p>	
Transportation	<p>The site is in good proximity to the services and facilities of Cranbrook, which is approximately 500m away, and is accessible to Broadclyst village. However, it should be noted that Cranbrook is located on the opposite side of the railway line, and there are no direct walking or cycling routes to the settlement from the site.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.6: MU9, Land south of Clystlands Farm

SEA theme	Commentary, MU9: Land south of Clystlands Farm
	
Biodiversity	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. Given the size of the site, which could deliver more than 50 homes, any development would have to come forward in consultation with Natural England.</p> <p>There is an ecological corridor of hedgerows along the south western boundary. Given the presence of coastal and floodplain grazing marsh BAP Priority Habitat to the west of the site, protected species might be present on 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 parish and an intensification of uses at this location.</p> <p>In terms of emissions from transport, the site is located at relative distance from the services and facilities of Cranbrook, which is approximately 1.2km away.</p> <p>According to the Flood Map for Planning, a very limited part of the western edge of the site is at ‘high’ risk of fluvial flooding. This means that each year this area has a chance of flooding of greater than 3.3%. Most of the site is not within a flood risk zone however. The site is not at risk of surface water flooding.</p>
Landscape	<p>The site is at low sensitivity regarding landscape sensitivity and visual impact. This is because of screening by existing trees and vegetation and enclosure within the landscape. There are some views in from surrounding properties but overall the site will have a minimal visual impact on wider landscape character.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No features on or adjacent to the site are listed on the Devon HER.</p>




SEA theme	Commentary, MU9: Land south of Cystlands Farm	
Land, Soil and Water Resources	<p>The site is underlaid by a mixture of Grade 2 agricultural land, which is very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting, and Grade 3b agricultural land, which is moderate quality agricultural land with strong limitations that affect the choice of crop, timing and type of cultivation/harvesting or level of yield. The part of the site which is covered by Grade 2 agricultural land (c.50% of the site) is land classified as the best and most versatile.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including through the delivery of affordable housing.</p> <p>The services and facilities of Cranbrook are approximately 1.3km away. The site is 400m from bus stops on London Road, which provide access to Cranbrook and Exeter. There is also a cycle route along London Road, linking both Cranbrook and Exeter. However, there is not currently a safe off-road link from the site to London Road.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Cranbrook Medical Centre.</p> <p>The site is in proximity to walking and cycling routes on London Road (c.350m away). This will support the use of healthier modes of travel. It should be noted though that there is not currently a safe off-road pedestrian or cycle link from the site to London Road.</p>	
Transportation	<p>The site is located 400m from bus stops on London Road, which provide access to bus services to Cranbrook and Exeter. The site is also accessible to the cycle route located along London Road, which links Cranbrook and Exeter.</p> <p>It should be noted though that there is not currently a safe off-road pedestrian or cycle link from the site to London Road.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.7: H1, Land to the east of Town End

SEA theme	Commentary: H1, Land to the east of Town End
Biodiversity	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. Given the size of the site, which could deliver more than 50 homes, any development of this scale would be required to come forward in consultation with Natural England.</p> <p>The site itself does not have significant biodiversity value, and no areas of BAP Priority Habitat are present on or in the vicinity 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 well located for the services and facilities located in Broadclyst and local bus networks serving the village. This will help reduce the need to travel for these amenities and support public transport use, helping to limit emissions from transport.</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial or surface water flooding.</p>
Landscape	<p>Although the site is enclosed by hedges which act as a screening barrier, the site is slightly raised which means the site has visibility from surrounding properties. Development of the site also has the potential to affect the wider landscape setting of the village through affecting views from the east.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>The site has some visibility from the Grade II listed Lake House, which is located approximately 25m north of the north east corner of the site. Lake House dates from the C16th or early C17th, and was substantially remodelled and enlarged in the C19th.</p> <p>No features on or adjacent to the site are listed on the Devon HER.</p>

SEA theme		Commentary: H1, Land to the east of Town End	
Land, Soil and Water Resources	Recent agricultural land classification has not been undertaken for the site. However, the provisional agricultural land dataset suggests that the site is underlain by Grade 1 agricultural land. This is land classified as the best and most versatile which is excellent quality agricultural land with no or very minor limitations. This classification is uncertain however. In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).		
Population and Community	Allocation of the site would contribute positively towards meeting local housing needs in Broadclyst village, including through the delivery of affordable housing. The site would deliver housing accessible to the day-to-day services and facilities available in Broadclyst.		
Health and Wellbeing	The site is in good proximity to Broadclyst Surgery, which is 500m walk away. The site is also accessible to the village's extensive Public Rights of Way network.		
Transportation	The site is accessible to the services and facilities located in Broadclyst village. This will help limit the need to travel for day-to-day amenities. The site is also accessible to the bus networks which serve the village.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	


Table 4.8: H2, Land at Jarvishayes Farm

SEA theme	Commentary: H2, Land at Jarvishayes Farm
	
	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. However, given development of the site would deliver a lower number of homes than this IRZ threshold, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>No areas of BAP Priority Habitat are present on or in the vicinity of the site. The site has been identified by the Devon Biodiversity Records Centre as an ‘Unconfirmed Wildlife Site’. These are sites which may be of wildlife value and have been identified as having potential but have not been surveyed to establish their importance.</p>
	<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 well located for the services and facilities located in Broadclyst and local bus networks serving the village. This will help reduce the need to travel for these amenities and support public transport use, helping to limit emissions from transport.</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial or surface water flooding.</p>
Landscape	<p>Whilst the site is not readily visible from the wider landscape, the site has significant potential to impact on local villagescape character, historic landscape character and a sense of place. This has been discussed in more detail under the ‘Historic Environment’ SEA theme below.</p>

SEA theme	Commentary: H2, Land at Jarvishayes Farm
Historic Environment	<p>The site has significant historic environment sensitivity.</p> <p>The site is located adjacent to the Broadclyst Conservation Area, which encloses the northern part of the site. An up to date Conservation Area Appraisal has not been undertaken for the conservation area, and the previous conservation area appraisal does not consider this part of the conservation area (as the conservation area was extended after the appraisal had been undertaken). However, given the site comprises an open area visible to and from the conservation area to the south of Sunnyfield, development on the site is likely to have significant effects on the setting of the conservation area.</p> <p>The site is visible from four Grade II listed buildings, which are located 20m to the east on the opposite side of the B3181. These are: 1, 2 and 3, Newbuildings; 4, 5 and 6, Newbuildings; 7, 8 and 9, Newbuildings; and 10, 11 And 12, Newbuildings. Dating from 1870-1, these comprise part of a long sequence of eight blocks of houses built to replace dwellings on the same site destroyed in the Broadclyst fire of 1870. In addition, the Grade II listed Prior's Court is located 20m to the west of the site. This comprises a house with a late C16th core remodelled and extended in the C19th. The setting of these five nationally listed features have the potential to be impacted by development on the site.</p> <p>No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site. In addition no further features on or adjacent to the site are listed on the Devon HER.</p>
Land, Soil and Water Resources	<p>Recent agricultural land classification has not been undertaken for the site. However, the provisional agricultural land dataset suggests that the site is underlain by Grade 1 agricultural land. This is land classified as the best and most versatile which is excellent quality agricultural land with no or very minor limitations. This classification is uncertain however.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs in Broadclyst village, including potentially through the delivery of affordable housing. The site would deliver housing accessible to the day-to-day services and facilities available in Broadclyst.</p>
Health and Wellbeing	<p>The site is in good proximity to Broadclyst Surgery, which is 350m walk away. The site is also accessible to the village's extensive Public Rights of Way network.</p>
Transportation	<p>The site is accessible to the services and facilities located in Broadclyst village. This will help limit the need to travel for day-to-day amenities. The site is also accessible to the bus networks which serve the village.</p>

SEA theme		Commentary: H2, Land at Jarvishayes Farm	
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.9: H3, Blackhorse Gardens

SEA theme		Commentary: H3, Blackhorse Gardens	
			
Biodiversity	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. However, given development of the site would deliver a lower number of homes than this IRZ threshold, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>The site itself does not have significant biodiversity value, and no areas of BAP Priority Habitat are present on or in the vicinity 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 parish 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 has excellent access to local bus routes and cycle routes linking Exeter. 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>According to the Flood Map for Planning, the site is not at risk of fluvial or surface water flooding.</p>		
Landscape	<p>Whilst there are some views in from surrounding properties, the site has low landscape sensitivity due to it being well screened and being located close to a busy road (Honiton Road). Development at this location is therefore unlikely to have a major impact on landscape character.</p>		

SEA theme	Commentary: H3, Blackhorse Gardens	
Historic Environment	<p>The site is not within the setting of a conservation area. 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>The site does not contain any features listed on the Devon HER. Whilst Honiton Road (located to the south) 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.</p>	
Land, Soil and Water Resources	<p>Recent agricultural land classification has not been undertaken for the site. However, such classification has been undertaken for adjoining land, which indicates that the site is likely to be underlain by Grade 3a agricultural land. This is land classified as the best and most versatile which is good quality agricultural land with moderate limitations that affect the choice of crop, timing and type of cultivation/harvesting or level of yield.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including potentially through the delivery of affordable housing.</p> <p>The site has excellent access to the walking and cycling routes and bus services located on Honiton Road. These provide access to the services and facilities located in Cranbrook and Exeter.</p>	
Health and Wellbeing	<p>The site is accessible to Cranbrook Medical Centre, including via bus.</p> <p>The site has excellent access to walking and cycling routes on London Road. This will support the use of healthier modes of travel.</p>	
Transportation	<p>The site is readily accessible to the walking and cycling routes located along Honiton Road.</p> <p>Access to local bus services (which link Exeter and Cranbrook) is via the nearest bus stops located close by on Honiton Road.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.10: H6, Land at Heathfield

SEA theme	Commentary: H6, Land at Heathfield
Biodiversity	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. However, given development of the site would deliver a lower number of homes than this IRZ threshold, no significant effects on the SSSI are anticipated as a result of the scale of development proposed.</p> <p>No areas of BAP Priority Habitat are present on or in the vicinity of the site. A number of mature trees are present on site boundaries; six of which are subject to tree protection orders.</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, though these are unlikely to be significant given the size of the site and the scale of likely development.</p> <p>The site is well located for the services and facilities located in Broadclyst and local bus networks serving the village. This will help reduce the need to travel for these amenities and support public transport use, helping to limit emissions from transport.</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial or surface water flooding.</p>
Landscape	<p>There would be some views in from properties on the south west boundary. However, overall the site is at low sensitivity regarding wider landscape character sensitivity, and visual impact would be limited due to existing screening.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <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>No features on or adjacent to the site are listed on the Devon HER.</p>



SEA theme		Commentary: H6, Land at Heathfield	
Land, Soil and Water Resources	Recent agricultural land classification has not been undertaken for the site. However, the provisional agricultural land dataset suggests that the site is underlain by Grade 1 agricultural land. This is land classified as the best and most versatile which is excellent quality agricultural land with no or very minor limitations. This classification is uncertain however. In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).		
Population and Community	Allocation of the site will contribute positively towards meeting local housing needs in Broadclyst village, including potentially through the delivery of affordable housing. The site would deliver housing accessible to the day-to-day services and facilities available in Broadclyst.		
Health and Wellbeing	The site is in proximity to Broadclyst Surgery, which is 850m walk away. The site is also accessible to the village's extensive Public Rights of Way network.		
Transportation	The site is accessible to the services and facilities located in Broadclyst village. This will help limit the need to travel for day-to-day amenities. The site is also accessible to the bus networks which serve the village.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

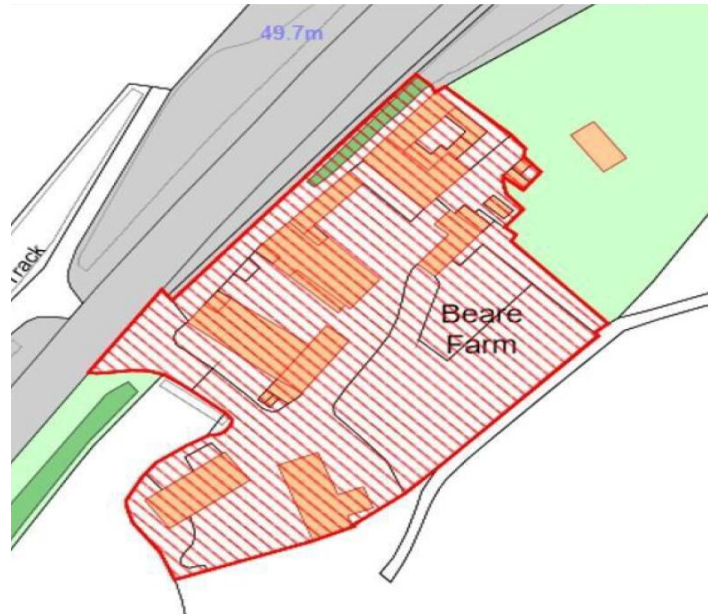
Table 4.11: H8, Land north of Clystlands Farm

SEA theme	Commentary: H8, Land north of Clystlands Farm
<p style="text-align: center;">Site H8</p>	
Biodiversity	<p>The site is within a SSSI impact risk zone (IRZ) for “Residential development of 50 units or more”. Given the size of the site, which could deliver more than 50 homes, any development of this scale would be required to come forward in consultation with Natural England.</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 parish and an intensification of uses at this location.</p> <p>In terms of emissions from transport, the site is located at some distance from the services and facilities of Cranbrook, which is approximately 1.5km away, and is not currently accessible by cycle or pedestrian links.</p> <p>According to the Flood Map for Planning, a very limited part of the western edge of the site is at ‘high’ risk of fluvial flooding. This means that each year this area has a chance of flooding of greater than 3.3%. Most of the site is not within a flood risk zone however. The site is not at risk of surface water flooding.</p>
Landscape	<p>There will be some views in from surrounding properties on Shercroft Close and Cotterell Road. However, the site is overall at low landscape sensitivity due to its relative enclosure within the landscape and the existing settlement pattern.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No features on or adjacent to the site are listed on the Devon HER.</p>

SEA theme	Commentary: H8, Land north of Clystlands Farm	
Land, Soil and Water Resources	<p>The site is underlaid by Grade 2 agricultural land, which is very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting. This comprises land classified as the best and most versatile.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Allocation of the site will contribute positively towards meeting local housing needs, including potentially through the delivery of affordable housing.</p> <p>The services and facilities of Cranbrook are approximately 1.5km away. The site is 700m from bus stops on London Road, which provide access to Cranbrook and Exeter. There is also a cycle route along London Road, linking both Cranbrook and Exeter. However, there is not a safe off-road link from the site to London Road, which undermines accessibility by non-car modes.</p>	
Health and Wellbeing	<p>The site is relatively accessible to Cranbrook Medical Centre.</p> <p>The site is located approximately 650m from walking and cycling routes on London Road. However, there is not a safe off-road link from the site to London Road. This is likely to discourage the use of healthy modes of travel.</p>	
Transportation	<p>The settlement of Cranbrook is approximately 1.5km away. This is accessible via bus routes along London Road, which are located approximately 700m away. The site is also in proximity to the cycle route located along London Road, which links Cranbrook and Exeter. It should be noted though that there is not currently a safe off-road pedestrian or cycle link from the site to London Road. This will undermine the use of sustainable transport modes.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.12: EC1, Beare Farm

SEA theme	Commentary: EC1, Beare Farm
Biodiversity	<p>The site is not within a SSSI impact risk zone (IRZ) for the type of employment land development proposed. No significant effects on SSSIs are therefore anticipated.</p> <p>The site is located adjacent to an area of deciduous woodland BAP Priority Habitat and an area of traditional orchard BAP Priority Habitat, which are located to the north east of the site. Whilst direct impacts on these habitats from landtake and fragmentation are not anticipated, disturbance may take place from new development at this location from noise, light pollution or trampling from enhanced access.</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 parish and an intensification of uses at this location.</p> <p>In terms of emissions from transport, the site is located at some distance from the services and facilities of Broadclyst, which is approximately 4km away. The site is however located 400m from a bus stop.</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial or surface water flooding.</p>
Landscape	<p>The site is overall at low landscape sensitivity due to its relative enclosure within the landscape, the presence of the B3181 and M5 (beyond), and the presence of existing buildings and agricultural uses on the site.</p>



SEA theme	Commentary: EC1, Beare Farm	
Historic Environment	<p>A number of features of historic environment interest are present on the site and would have the potential to be affected by development.</p> <p>The Grade II listed 'Beare Farmhouse and Front Garden Area Wall' and Grade II listed 'Stone Barn And Linhay Immediately South West Opposite Front of Beare Farmhouse' are located on the site. Further features present on the site listed on the HER include: the C17/C18th cob barn + six bay linhay; the Beare Farmstead; site of a kiln; and site of a quarry. These features are associated with the historic farmstead at this location, which originally dates from from the C15th.</p> <p>No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site and the site is not in the vicinity of a conservation area.</p>	
Land, Soil and Water Resources	<p>The site comprises existing development. As such development of the site would not lead to the loss of productive agricultural land and would support the efficient use of land.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>Regeneration of the site for employment uses would support economic vitality and employment opportunities.</p> <p>The site is accessible by non-car modes. In this context it is located 400m from a bus stop, which provides access to Exeter, Cullompton and Tiverton via Stagecoach service 1.</p>	
Health and Wellbeing	<p>The site is located 4km from Broadclyst Surgery.</p> <p>The locality is not linked to an extensive Public Rights of Way network comprising footpaths or bridleways.</p>	
Transportation	<p>The site is located approximately 400m from a bus stop which connects to Stagecoach service 1, and provides access to Exeter city centre, Cullompton and Tiverton.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.13: EC3, Winter Gardens

SEA theme	Commentary: EC3, Winter Gardens
Biodiversity	<p>The site is not within an IRZ for the type of employment land development considered for the Neighbourhood Plan. No significant effects on SSSIs are therefore anticipated as a result of the type of development proposed.</p> <p>No areas of Biodiversity Action Plan (BAP) are present on or in the vicinity 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 parish and an intensification of uses at this location.</p> <p>In terms of emissions from transport, the site is accessible to the services and facilities and bus links present in Broadclyst village, which are approximately 600m away.</p> <p>According to the Flood Map for Planning, the site is not at significant risk of fluvial or surface water flooding.</p>
Landscape	<p>The site is overall at lower landscape sensitivity due to the presence of existing buildings associated with agricultural uses on the site.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>The site of 'winters gardens' farmhouse, which was rebuilt in 1953 after the original house burnt down in 1951, is listed on the Devon HER. This is located 30m to the south west of the site but does not form a significant historic environment constraint.</p>

SEA theme		Commentary: EC3, Winter Gardens	
Land, Soil and Water Resources	<p>The site comprises existing agricultural buildings. As such development of the site would not lead to the loss of productive agricultural land.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>		
Population and Community	<p>Regeneration of the site for employment uses would support economic vitality and employment opportunities.</p> <p>The site is accessible to the services and facilities and bus links present in Broadclyst village, which are approximately 600m away.</p>		
Health and Wellbeing	<p>The site is located in proximity to Broadclyst Surgery, which is 1km away. The site is also accessible to the village's extensive Public Rights of Way network.</p>		
Transportation	<p>The site is accessible to the services and facilities located in Broadclyst village. This will help limit the need to travel for day-to-day amenities. The site is also accessible to the bus networks which serve the village.</p>		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effect	

Table 4.14: Summary of SEA site appraisal findings

Site	Bio-diversity	Climate Change	Landscape	Historic Env.	Land, Soil and Water Resources	Population and Community	Health and Wellbeing	Transport
MU1	Yellow	Red	Yellow	Yellow	Red	Blue	Blue	Red
MU3/MU4	Blue	Blue	Yellow	Yellow	Green	Blue	Blue	Red
MU5	Red	Red	Yellow	Red	Green	Blue	Green	Red
MU8	Yellow	Yellow	Blue	Yellow	Green	Green	Blue	Blue
MU9	Blue	Blue	Yellow	Yellow	Red	Blue	Blue	Blue
H1	Blue	Green	Red	Red	Red	Green	Green	Green
H2	Blue	Green	Red	Red	Red	Green	Green	Green
H3	Yellow	Green	Yellow	Yellow	Red	Green	Green	Green
H6	Blue	Green	Yellow	Yellow	Red	Green	Green	Green
H8	Yellow	Blue	Blue	Yellow	Red	Blue	Blue	Blue
EC1	Blue	Blue	Yellow	Red	Green	Green	Blue	Green
EC3	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Green

Key			
Likely adverse effect (without mitigation measures)	Red	Likely positive effect	Green
Neutral/no effect	Yellow	Uncertain effect	Blue

Sites for a potential Community Sports Hub

4.20 A key objectives of the Neighbourhood Plan is to maintain and improve community facilities and provide additional community spaces for sports, leisure and recreation. To this end community engagement has indicated significant support for the delivery of a new Community Sports Hub in the parish.

4.21 In response to this, in addition to requesting proposals for land for residential, employment and mixed uses, the Call for Sites undertaken for the Neighbourhood Plan requested proposals for land to deliver a large sports facility in the parish.


4.22 The Call for Sites process brought forward three proposals for land for delivering such a facility. These are as follows:

- CSH B: Brockhill Site off Station Road
- CSH C: Clyst Vale Community College Sports Field Site
- CSH W: Wintergardens Site

4.23 To support the consideration of the suitability of the sites as a potential Neighbourhood Plan allocation for a Community Sports Hub, the SEA process has undertaken an appraisal of the key constraints and opportunities present at each of the sites and potential effects that may arise as a result of this type of development at these locations.

4.24 Tables 4.14 to 4.16 below present an appraisal of the three potential locations.

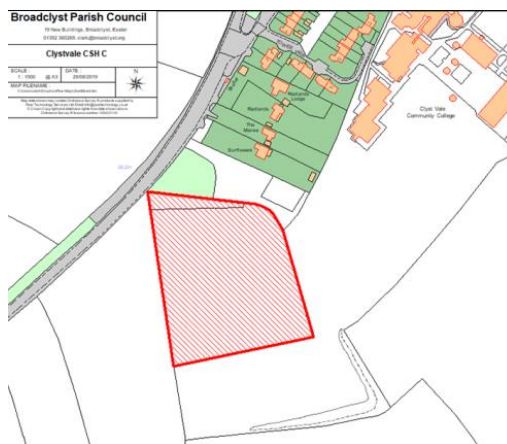
Table 4.14: Site CSH B: Brockhill Site off Station Road

SEA theme	Commentary: CSH B, Brockhill Site off Station Road
Biodiversity	 <p>The site is not within an IRZ for the type of development considered for the Neighbourhood Plan. No significant effects on SSSIs are therefore anticipated as a result of the type of development proposed.</p> <p>An area of deciduous woodland BAP Priority Habitat is located adjacent to the site to the south and an area of traditional orchard BAP priority habitat is located adjacent to the north of the site. Whilst direct impacts on these habitats from landtake and fragmentation are not anticipated, disturbance may take place from new community and sports provision at this location from noise, light pollution or trampling from enhanced access.</p>
Climate Change	<p>In terms of emissions from transport, the site is accessible to the main population centre of the parish at Broadclyst village (although it should be noted it is not currently accessible by safe off-road pedestrian and cycle routes from the village).</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial or surface water flooding.</p>
Landscape	<p>Given the site's separation from the village, the delivery of a new Community Sports Hub has the potential to have impacts on landscape character in the area through impacts on the open perspective of the area.</p>

SEA theme	Commentary: CSH B, Brockhill Site off Station Road	
Historic Environment	<p>The Grade II listed Heathfield Farmhouse is located to the north of the site. Whilst the site is screened from this listed feature by existing vegetation, development of the site has the potential to separate the historic farmhouse from its agricultural setting to the south.</p> <p>The Generator House, Brockhill House, which is located to the south east of the site, and a field boundary to the north of the site are listed on the Devon HER. These do not however form significant historic environment constraints. No features listed on the Devon HER are present on the site.</p> <p>The site is not within the setting of a conservation area. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p>	
Land, Soil and Water Resources	<p>The site comprises a mixture of Grade 3a land (which is land classified as the ‘best and most versatile’ agricultural land) and Grade 3b land (agricultural land which is not classified as such). As such development of the site would have the potential to lead to the loss of productive agricultural land.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>	
Population and Community	<p>The delivery of a new Community Sports Hub in close proximity to Broadclyst village will bring benefits for the quality of life of residents and community vitality. The facility also has the potential to deliver work and employment space which supports the economic vitality of the village.</p>	
Health and Wellbeing	<p>The delivery of a new Community Sports Hub in close proximity to Broadclyst village will bring significant benefits for the health and wellbeing of residents.</p>	
Transportation	<p>The site is accessible to Broadclyst village and its bus networks. The site is however not currently directly linked by safe walking and cycling routes to the village along Station Road.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.15: Site CSH C Clyst Vale Community College Sports Field Site

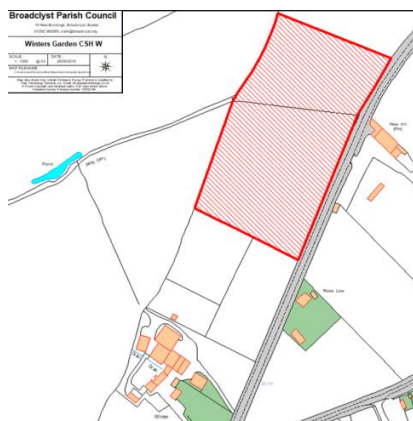
SEA theme	Commentary: Site CSH C, Clyst Vale Community College Sports Field Site
Biodiversity	<p>The site is not within an SSSI IRZ for the type of development considered for the Neighbourhood Plan. No significant effects on SSSIs are therefore anticipated as a result of the type of development proposed.</p> <p>No areas of BAP Priority Habitat are present on or in the vicinity of the site.</p>
Climate Change	<p>In terms of emissions from transport, the site is accessible to the main population centre of the parish at Broadclyst village (although there are some safety issues associated with pedestrian access).</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial flooding or at significant risk of surface water flooding.</p>
Landscape	<p>The site is relatively enclosed in the landscape due to existing screening, flat topography and the presence of Clyst Vale Community College to the north east.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No features listed on the Devon HER are present on or adjacent to the site.</p>
Land, Soil and Water Resources	<p>The site comprises land classified as Grade 3b agricultural land. This is not land classified as the 'best and most versatile'.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>



SEA theme	Commentary: Site CSH C, Clyst Vale Community College Sports Field Site	
Population and Community	The delivery of a new Community Sports Hub in close proximity to Broadclyst village will bring benefits for the quality of life of residents and community vitality. The facility also has the potential to deliver work and employment space which supports the economic vitality of the village.	
Health and Wellbeing	The delivery of a new Community Sports Hub in close proximity to Broadclyst village will bring significant benefits for the health and wellbeing of residents.	
Transportation	The site is accessible to Broadclyst village and its bus networks. The site is however not currently directly linked by safe walking and cycling routes to the village given access to the footpath along the B3181 would require a crossing of this busy road.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Table 4.16: CSH W, Wintergardens

SEA theme	Commentary: CSH W, Wintergardens
Biodiversity	<p>The site is not within an SSSI IRZ for the type of development considered for the Neighbourhood Plan. No significant effects on SSSIs are therefore anticipated as a result of the type of development proposed.</p> <p>No areas of BAP Priority Habitat are present on or in the vicinity of the site.</p>
Climate Change	<p>In terms of emissions from transport, the site is accessible to the main population centre of the parish at Broadclyst village.</p> <p>According to the Flood Map for Planning, the site is not at risk of fluvial flooding or at significant risk of surface water flooding.</p>
Landscape	<p>Given its separation from the village, the delivery of a new Community Sports Hub has the potential to have impacts on landscape character in the area through effects on the open perspective of the area.</p>
Historic Environment	<p>The site is not within the setting of a conservation area.</p> <p>No nationally listed buildings are present on the site and the site is not within the setting of any listed buildings. No scheduled monuments or registered parks and gardens are in the vicinity of (or have the potential to be affected by development on) the site.</p> <p>No features listed on the Devon HER are present on or adjacent to the site.</p>
Land, Soil and Water Resources	<p>Recent agricultural land classification has not been undertaken at the site. However, the provisional agricultural land dataset suggests that the site may be underlain by Grade 1 agricultural land. This is land classified as the best and most versatile which is excellent quality agricultural land with no or very minor limitations. This classification is uncertain however.</p> <p>In terms of the water environment, there are no watercourses passing through the site boundaries. The site does not overlap with a groundwater source protection zone (SPZ).</p>



SEA theme	Commentary: CSH W, Wintergardens	
Population and Community	The delivery of a new Community Sports Hub in close proximity to Broadclyst village will bring benefits for the quality of life of residents and community vitality. The facility also has the potential to deliver work and employment space which supports the economic vitality of the village.	
Health and Wellbeing	The delivery of a new Community Sports Hub in close proximity to Broadclyst village will bring significant benefits for the health and wellbeing of residents.	
Transportation	The site is accessible to Broadclyst village and its bus networks. The site is linked to the village via an existing public right of way.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effect

Preferred approach in the Neighbourhood Plan in light of appraisal findings

Choice of site allocations for housing, mixed use development, employment land and a Community Sports Hub

4.25 In light of the various appraisals undertaken for the Neighbourhood Plan, evidence base studies and the outcomes of public consultation events, the current re-submission version of the Neighbourhood Plan allocates three sites for housing. These are as follows:

Blackhorse Gardens:

Small scale development to include the following:

- Two live-work units
- Two houses.

Broadclyst Station: Site between Shercroft Close and Cotterell¹⁸:

24 residential dwellings to include the following:

- 12 affordable houses
- 5 self-build plots
- 7 open market houses

¹⁸ This aligns with the Land north of Clystlands Farm site assessed above

The allocation will also include a children's play park and the provision of land for a 5m pedestrian and cycle lane for the Cranbrook to Exeter Cycle route.

Heathfield Site, Broadclyst

- 16 houses, 50% of which will be affordable.

4.26 In addition to the above, the Neighbourhood Plan seeks to regenerate three existing sites for employment uses, at Beare Farm, Crannaford and the Winter Gardens site.¹⁹

4.27 In terms of a Community Sports Hub, the Neighbourhood Plan allocates Site CSH C: Clyst Vale Community College Sports Field Site. This was allocated following a consideration of evidence base studies undertaken on the potential Community Sports Hub, including the findings of a feasibility assessment undertaken by East Devon District Council in March 2020,²⁰ and the results of community engagement on the issue.

4.28 The Neighbourhood Plan recognises that on a number of these sites there are significant environmental constraints which would need to be effectively addressed if development were to come forward at these locations.

4.29 **Chapter 5** of this Environmental Report therefore considers these issues in light of the proposed policy approaches taken forward through the current version of the Neighbourhood Plan.

Neighbourhood Plan policies

4.30 To support the implementation of the vision and objectives for the Broadclyst NP discussed in **Chapter 2**, the re-submission version of the Neighbourhood Plan puts forward 39 policies to guide development in the Neighbourhood Plan area.

4.31 These were developed following extensive community consultation and evidence gathering, and were refined following Regulation 14 consultation on the Neighbourhood Plan and following initial submission of the plan in late 2021. An assessment of an earlier iteration of these policies was presented in the Environmental Report accompanying Regulation 14 consultation on the 'pre-submission' version of the Neighbourhood Plan.

4.32 The policies presented in the current re-submission version of the Neighbourhood Plan are as follows:

¹⁹ The Regulation 14 consultation version of the Neighbourhood Plan also proposed an additional site allocation at the Jarvishaye site in Broadclyst village for 20 homes. Following the receipt of responses at Regulation 14 consultation, and a further consideration of the heritage constraints affecting this location, it was decided to no longer allocate this site through the Neighbourhood Plan. In addition, the Regulation 14 consultation version of the plan and subsequent initial submission version of the Neighbourhood Plan included allocations for mixed use development at Elbury Farm and Silverton. These sites have been withdrawn from the present resubmission Neighbourhood Plan in order to allow extra technical work to be completed before potentially including these sites in a revised Neighbourhood Plan in the future.

²⁰ East Devon District Council (March 2020) High Level Feasibility Testing: Broadclyst Neighbourhood Plan and a Multi-use Artificial Sports Pitch Proposal

Table 4.13: Broadclyst Neighbourhood Plan policies

Policies

Community Facilities

CF1 Community Sports Hub

CF2 New and Enhanced Sport, Recreation and Community Facilities

Design

D1 High Quality Design

DH1 Historic Character

DH2 Development of Existing Buildings in and adjacent to the Conservation Area

DH3 Historic Restoration

Design and Climate Change

DC1 Energy Efficient New Buildings

DC2 Increasing Energy Efficiency of Existing Buildings

DC3 Sustainable Drainage

DC4 Residential Storage

DC5 District Heating Schemes

DC6 Community Led Renewable Energy Production

Economy and Employment

EC1 Regeneration of Beare Farm

EC2 Regeneration of Crannaford Site

EC3 Regeneration of Winter Gardens Site

EW1 Development of Work Hubs

ET1 Development of Tourism

ET2 Holiday Accommodation

ET3 Caravan and Camping Sites

EA1 Agricultural Diversification

Housing

H1 Blackhorse Gardens Site

Policies

H2 Broadclyst Station: Site between Shercroft Close and Cotterell Road

H3 Broadclyst Village: Heathfield Site

H4 Social and Affordable Housing

H5 New Housing in Broadclyst Parish

H6 Self-Build

H7 Development of Live-Work Units

Infrastructure and Access

T1 New Pedestrian and Cycle Routes

T2 Pedestrian and Cycle Bridge over the Waterloo Railway Line

T3 Parking Provision

T4 Active Travel Infrastructure

T5 Low Carbon Travel Provision

Natural Environment

NE1 Protecting Woodland

NE2 Green Corridors

NE3 Tree Replacement

NE4 The Protection and Enhancement of Hedgerows

NE5 Landscape and Biodiversity

NE6 Local Green Spaces

NE7 Flood Management

4.33 The following chapter presents an appraisal of these policies.

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

Introduction

- 5.1 The aim of this chapter is to present appraisal findings in relation to the re-submission version of the Broadclyst NP. This chapter presents:
- An appraisal of the re-submission version of the Neighbourhood Plan under the eight 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 eight 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.

Biodiversity

- 5.5 There are significant biodiversity assets and constraints within and surrounding the Plan area, which require consideration in planning and development.
- 5.6 Internationally designated sites, whilst not located within the Plan area itself, are susceptible to development in certain areas of East Devon; including Broadclyst Parish. Notably, the Exe Estuary Special Protection Area (SPA) and Ramsar site falls within approximately 7km of the parish, and the East Devon Pebblebed Heaths Special Area of Conservation (SAC) falls within 9km. The South East Devon European Sites Mitigation Strategy²¹ is a key consideration in this respect, which requires (where appropriate) that development within 10km of European Sites provide a financial contribution to mitigating additional recreational pressures generated by new development. Contributions are

²¹ Liley, D. et al. (2014) South-east Devon European Site Mitigation Strategy [online] available at: <https://eastdevon.gov.uk/media/369997/exe-overarching-report-9th-june-2014.pdf>

generally sought towards Suitable Alternative Natural Greenspaces (SANGs), and in the context of Broadclyst, this is likely to result in financial contributions to strategic SANGs as part of the Clyst Valley Regional Park Masterplan.²² The strategic mitigation sought by East Devon District Council is considered likely to ensure that development in the Plan area does not lead to significant effects in relation to European sites.

- 5.7 There is one nationally designated Site of Special Scientific Interest (SSSI) located within the Plan area. In addition, most of the Plan area lies within a SSSI Impact Risk Zone (IRZ) where development of 50 or more homes, within or outside of the existing settlement areas, will require further consultation with Natural England. Certain water discharge loads (over 20m³/ day) to ground or surface water will also trigger this requirement for further consultation in relation to nationally designated biodiversity. None of the proposed employment, housing or mixed-use allocation sites in the Broadclyst NP are likely to trigger this requirement in terms of the scale of development at the sites.
- 5.8 The Broadclyst NP provides additional protections through Policy NE5 which seek to ensure that development delivers biodiversity net gains (of 10%) using the DEFRA metric to calculate the impact of proposals. Considering the existing and proposed policy mitigation and consultation requirements, and the previously developed nature of the site, no significant effects in relation to nationally designated biodiversity sites are anticipated.
- 5.9 Local biodiversity sites are also susceptible to development in the Plan area. In particular, the eight County Wildlife Sites, 15 Unconfirmed Wildlife Sites, and further Priority Habitats are vulnerable to the effects of habitat loss and habitat fragmentation, as well as increased disturbance, noise, light and air pollution.
- 5.10 The Broadclyst NP identifies three sites in the parish for housing development. All of these are in settlement edge locations. The Broadclyst Station housing site allocation (Policy H2) is located adjacent to/ partially within the large band of Coastal and Floodplain Grazing Marsh Priority habitat surrounding the River Clyst which is also an Unconfirmed Wildlife Site. A comprehensive scheme is proposed at this site which includes landscaping elements and new hedgerow with trees.
- 5.11 Of the three sites proposed for employment development, one (Beare Farm under Policy EC1) lies adjacent to Deciduous Woodland Priority habitat which is again an Unconfirmed Wildlife Site. This is a regeneration site utilising previously developed land at Beare Farm.
- 5.12 Alongside the requirement for biodiversity net gain, Policy NE5 identifies that “*development proposals should seek to contribute to a high quality and biodiversity-rich natural environment*”. The policy expects development to retain landscape characteristics that provide important habitats for wildlife and give preference to native plant species. Specifically within Westclyst and Tithebarn habitat creation and biodiversity enhancements are expected in any new development.

²² East Devon District Council (2020) Information: Clyst Valley Regional Park Masterplan [online] available at: <https://eastdevon.gov.uk/planning/planning-policy/other-plans/clyst-valley-regional-park-masterplan/>

- 5.13 The proposed policy framework also provides additional protections for the extensive woodland areas in the parish through Policy NE1, which precludes development that would result in the loss, damage, or deterioration of such woodland. Subject to these requirements, the policy also allows woodland development at Ashclyst Forest, Whitedown and Poundpit, Paradise Copse, Rattlecot Wood, Burrowton Copse and Danes Wood. Policy NE2 also identifies locally significant woodland areas, affording them a degree of protection as green corridors, and supporting enhancements, including in terms of appropriate public access.
- 5.14 Further support for biodiversity include through the designation of five Local Green Spaces and support for the designation of four further Local Green Spaces (Policy NE6), the extension and regeneration of orchards, wildlife corridors, shelter belts and other tree replacement schemes (Policy NE3), enhancements in hedgerows (Policy NE4) and Natural Flood Management schemes (Policy NE7). These will support habitats, species and ecological networks in the Parish.
- 5.15 Overall, the Broadclyst NP seeks to protect habitats and species in the parish and provides support for further habitat creation and improved ecological connectivity. Alongside the embedded principle for biodiversity net gain in development, **minor long-term positive effects** are predicted in relation to biodiversity.

Climate Change

- 5.16 The climate change SEA objectives have a dual focus of reducing the contribution to climate change and supporting resilience to the potential effects of climate change, particularly flooding. Around the same time as the national Climate Emergency declaration (May 2019), Devon County Council endorsed the Devon Climate Declaration (May 2019). This was quickly followed by East Devon District Council's declaration of a local Climate Emergency, and Broadclyst Parish Council's Climate Emergency declaration in July 2019. East Devon District Council subsequently published the Climate Change Strategy 2020 – 2025 with the aspiration to be zero-carbon by 2040. Furthermore, the parish Council, in acknowledging their part to play, identify that "*Neighbourhood Plans (NP) are one way in which a new direction can be taken, helping to mitigate climate change and adapt to its effects, and, by local communities taking the lead and effectively giving consent for this rapid transition to take place, expanding the space within which politicians feel they can safely operate*". The Broadclyst NP seeks to address awareness of climate emergency and contribute positively towards meeting local and national climate objectives. In particular, design objectives include the intention "*to ensure that design of development addresses the challenges of climate emergency*".
- 5.17 Climate change adaptation is a key issue for development in the parish given the extent of the high flood risk areas in the north and west; in the broad floodplains of the Rivers Cranny, Clyst and Culm. Flooding is a frequent occurrence in the parish, particularly affecting local road infrastructure.
- 5.18 Three of the proposed allocation sites in the Broadclyst NP lie adjacent to/ partially within an area of high fluvial flood risk. A very limited part of the western edge of the Broadclyst Station site (Policy H2) is at 'high' risk of fluvial

flooding. This means that each year this area has a chance of flooding of greater than 3.3%. Regeneration at the Crannaford Site (Policy EC2) will also need to consider future flood risk implications given the proximity of high-risk areas adjacent to the sites.

- 5.19 The Broadclyst NP recognises the constraints of flood risk in the parish. In particular Policy NE7 has a close focus on initiating natural flood management measures through identifying specific natural measures that will be supported. This includes: tree and hedgerow planting; reconnecting rivers to their floodplains; provision of woody debris dams, and creation of water storage capacity within the floodplain. The policy, whilst prioritising natural flood management measures, also provides support for “*new engineered flood defences at appropriate places along the three rivers (the Culm, Cranny and Clyst) that will significantly improve natural flood and water management schemes*”. The policy provisions are likely to ensure that development avoids negative effects arising in relation to flood risk.
- 5.20 In addition, the provisions of Policy DC3 seek to enhance the management of surface water. This policy sets out a range of provision which seek to effectively manage surface water runoff, including through a requirement for development proposals to incorporate sustainable drainage systems, minimise the loss of green space lost to hard surfacing and demonstrate a facilitate a net reduction in surface water run off. It also supports the provisions of Policy NE7 setting out a presumption towards approaches which encourage natural flood management measures.
- 5.21 The Plan area is supported by a strong green and blue infrastructure network, which includes the river corridors and extensive woodland coverage in the north of the parish, particularly at Killerton Estate. This will ultimately support good resilience in light of climate change. The additional support provided through the Broadclyst NP in extending tree coverage (Policies NE2 and NE3) as well as delivering new green spaces (Policy NE6) will further enhance resilience, and indirect minor long-term positive effects are anticipated as a result. Furthermore, opportunities to deliver multiple benefits through natural habitats that support improved drainage are sought through Policy NE7.
- 5.22 With regards to climate change mitigation objectives, the Broadclyst NP embeds core mitigation considerations across the Plan themes; including within design, housing development, employment development, transportation, and the natural environment.
- 5.23 The allocations of the Broadclyst NP also each seek to contribute to mitigation objectives. The new Community Sports Hub and new recreational facilities (Policies CF1 and CF2) are expected to provide for active travel connections, electric charging points and generation of on-site renewable energy. Where employment provision is not connected to active travel routes, new pedestrian and cycle paths are expected in proposals for the site. All housing development sites are also expected to connect to cycling and walking networks and capitalise on opportunities associated with the Clyst Valley Regional Park Masterplan, for example supporting the Clyst Valley Trail.
- 5.24 In line with Policy D1, all new development is encouraged to use locally sourced materials, integrate climate resilience measures, secure net gains for

biodiversity, maximise carbon sequestration opportunities and carbon storage, enhance access to green space and enhance access to sustainable transport modes (including active travel opportunities). Policy DC1 seeks to ensure development maximises opportunities to use renewable and low carbon technologies and proposals submit a carbon reduction statement for approval and implementation. Carbon reduction statements are expected to meet or exceed the latest Building Regulations Part L which are expected to be updated during the plan period. Strong support is also provided for residential dwellings of Passivhaus standard, a 'fabric first' approach and on-site renewable energy generation. Furthermore, Policy DC2 supports development which increases the energy efficiency of existing buildings in the parish through both minimising energy requirements and incorporating renewable energy generation. In this respect the policy sets out a range of provisions to meet these aims.

- 5.25 Policy DC4 requires consideration of residential storage that supports higher levels of recycling, and residential storage for bicycles and scooters. Policy DC5 strongly supports the provision of Local Heating Scheme and similar and the use of excess energy from commercial and industrial uses and Policy DC6 provides supports community-led renewable energy generation.
- 5.26 In light of these provisions, the Broadclyst NP places significant emphasis on the opportunities for new development in the parish to support long-term climate change mitigation and adaptation goals. As a result, **long-term positive effects** are anticipated overall.

Landscape

- 5.27 Broadclyst Parish has a diverse landscape character, with extensive farmland and woodland shaping the character of the north and west in contrast with the strategic development occurring in the south and south-west around Exeter and the new town of Cranbrook.
- 5.28 Most views to the north are dominated by the skyline views of Killerton Clump, Ashclyst Forest, White Down Copse and Paradise Copse, and the extensive woodland areas are a significant landscape feature of the parish. There is a building vernacular in this area, particularly in those buildings associated with the Killerton Estate. Other significant landscape features include farmlands and farmsteads, river corridors and streams and nature rich grassland habitats.
- 5.29 In the south and south-west of the Plan area, the river valley character is retained, however, the surrounding areas are subject to strategic growth with Local Plan allocations at Pinhoe and Cranbrook. In this respect, the Broadclyst NP recognises the need to avoid further coalescence, particularly by maintaining the boundaries between Broadclyst Station and Cranbrook Town, although this area largely falls outside of the designated NP area.
- 5.30 The additional housing and economic growth sites proposed through the Broadclyst NP notably seek to avoid development in the most sensitive landscapes, with small-scale edge of settlement locations for housing development proposed and regeneration sites favoured for employment and mixed-use development. Whilst the proposed location for the Community Sports Hub under Policy CF1 is likely to lead to larger scale greenfield

development, it is recognised that impacts on landscape character will be limited by the delivery of new playing fields and recreational space.

- 5.31 Whilst the spatial strategy seeks to minimise the impact of development on the rural character of the parish, the policy framework provides additional support for the protection and enhancement of local distinctiveness and features contributing to landscape character. Of note, Policy NE5 seeks to ensure development proposals contribute to a high-quality environment by retaining and enhancing the existing landscape characteristics which contribute to character and aesthetic values. The policy seeks locally distinct landscaping and boundary treatments and design proposals which respond positively to the surrounding landscape setting. The policy is supported by Policy NE1 which identifies the areas of woodland in the parish which significantly contribute to landscape character and affords them an additional layer of policy protection. Furthermore, the provisions of Policies NE2, NE3 and NE4, which seek to extend green corridors, tree coverage and hedgerows, are considered likely to lead to incremental landscape improvements.
- 5.32 Design policies provide further protection for landscape character and quality. Policy D1 seeks high-quality design proposals which “*respond to the distinctive character of Broadclyst Parish*” and have regard to the Broadclyst Parish Character Assessment 2018. Furthermore, Policy D1 recognises that some areas of the parish would benefit from landscape improvements and supports opportunities to create new buildings and areas of distinction on suitable sites in these areas. The policy outlines detailed criterion to underpin high-quality design which includes parameters such as height, scale, layout and orientation, materials, access and public realm. Landscape and villagescape character will be further supported by the heritage policies of the Neighbourhood Plan, which have a close focus on the conservation and enhancement of the historic environment.
- 5.33 The parish also forms part of the Clyst Valley Regional Park Masterplan which proposes to restore nature and historic buildings, create trails, and tackle climate change and flooding. The Regional Park also plays a strategic role in reducing the impacts of recreation on European designated biodiversity sites. The Masterplan proposals are considered likely to deliver landscape improvements in the Plan area, and opportunities to capitalise on inter-plan cumulative positive effects should be sought. In this respect housing development sites are expected to connect to cycling and walking networks and capitalise on opportunities such as support for the Clyst Valley Trail.
- 5.34 Overall, the policies of the Broadclyst NP seek to minimise landscape impacts and maximise the potential for positive landscape enhancements. Furthermore, the Plan maximises opportunities to utilise brownfield land opportunities for employment development in the parish. Whilst minor long-term negative effects are anticipated as a result of a necessity to deliver development on greenfield through the development strategy, it is recognised that this is largely reflective of limited suitable alternative brownfield land opportunities.

Historic Environment

- 5.35 The Plan area contains a varied wealth of historic assets and features which are sensitive to development pressures. Many of the parish's listed buildings and structures are associated with the Killerton Estate, and Killerton House itself is a Grade II* registered park and garden. There is a building vernacular, particularly pronounced throughout the Estate, and its ownership and management under the National Trust has provided added protection for this area, which remains one of the best preserved of the large Devon estates.
- 5.36 The Broadclyst Conservation Area covers the northern part of the village centre, containing more examples of the local vernacular. In addition, many buildings and structure in the village and across the parish are non-designated assets of local historic interest and value.
- 5.37 In terms of the proposed allocations in the Broadclyst NP, development at some of the sites will need to consider the settings of nearby listed buildings and structures. This includes development at the Community Sports Hub reserve site (Policy CF2). Development may also need to consider wider impacts on heritage settings (e.g. on views) at the Community Sports Hub site (Policy CF1) and the Heathfield site in Broadclyst Village (Policy H3).
- 5.38 Development is proposed at Beare Farm (Policy EC1) which contains the Grade II listed Beare Farmhouse, garden wall, stone barn and linhay. Policy EC1 proposes refurbishment and selective development to create enterprise space and parking at this farmstead. Regeneration will deliver new offices, food and/ or drink production and small light industrial workshops.
- 5.39 Recognising potential issues and opportunities, the policies of the Neighbourhood Plan have a close focus on the conservation and enhancement of the historic environment. For example, Policy DH1 requires all new development affecting the Broadclyst Conservation Area or the setting of a listed building to enhance the positive attributes of the heritage asset. The policy requires design that conserves and enhances both designated and non-designated assets and their settings, maintains the historic pattern of development, complements the immediate streetscape and reinforces local identity. Under this policy, any proposal which could affect designated or non-designated assets must be accompanied by a Heritage Impact Assessment. Detailed design guidance in relation to the setting of the conservation area is also provided through Policy DH2.
- 5.40 Policy DH3 sets the parameters for development across the parish involving the restoration of heritage assets, including archaeological assets. Specifically, proposals are required to demonstrate how development offers a specific and measurable improvement to the historical integrity of the structure and/ or area. The policy also identifies four heritage assets for appropriate part or whole restoration. In this respect the employment allocation has the potential to support the restoration of Beare Farmhouse as a key heritage feature and facilitate the area's rejuvenation as part of a historic environment-led development.
- 5.41 Further policies (Policies D1, NE1 and NE5) seek to protect and enhance landscape features that contribute to heritage settings. The proposals to

extend woodland and tree coverage (Policies NE2 and NE3), protect hedgerows (Policy NE4) and deliver new green spaces (Policy NE6) are likely to support small-scale landscape improvements that provide benefits to the significance of heritage assets in the parish. This will be further supported by Policy DH4 which seeks to enhance linkages via the Clyst Valley Regional Park, with direct support for the creation of new heritage trails in the parish.

5.42 Overall, the Broadclyst NP proposes a growth strategy which includes direct restoration of heritage assets alongside regeneration and housing development in sensitive heritage settings. Whilst the Neighbourhood Plan provides detailed policy mitigation to reduce the impacts of the proposed growth strategy on the historic environment, and facilitate enhancements, the overall effects are ultimately dependent upon the detailed design and layout proposals for the sites. However the Neighbourhood Plan has a strong focus on implementing policy provisions which will support the significance of the parish's heritage resource.

Land, Soil and Water Resources

- 5.43 The Plan area contains a rich soil resources, with mixed farming as the predominant land use, including vegetable production and cider orchards. Significant areas of the parish are underlain by land classified as the best and most versatile agricultural land.
- 5.44 The proposed employment and mixed-use development sites in the Broadclyst NP seek to facilitate the regeneration of brownfield land opportunities in the parish. This will support the efficient use of land and help minimise the loss of productive agricultural land.
- 5.45 However, the proposed housing development sites are all greenfield sites at the settlement edge (at either Broadclyst Village or Broadclyst Station). Whilst, due to the lack of recent detail land classification the precise grade of soil resources to be lost at the three sites remains unknown at this stage, it is recognised that there is significant potential for these residential allocations to lead to the loss of higher quality ('best and most versatile') agricultural land.
- 5.46 More broadly in relation to soils resources, the Broadclyst NP policy framework identifies high-quality agricultural land as a key resource and landscape feature should be retained and enhanced where possible. Policy EA1 also provides support for agricultural diversification, particularly sustainable tourism which promotes high-quality local food and drink.
- 5.47 In terms of water quality, there are three main rivers within and surrounding the Plan area; the Rivers Cranny, Clyst and Culm. The Lower Cranny Brook runs roughly parallel to the railway line in the south of the Plan area and has shown general improvement in its ecological quality; progressing from bad in 2013, to poor in 2014, and moderate in 2016.²³ Similarly, the River Culm in the north of the Plan area has shown recent improvement in ecological quality with a moderate status in 2019 compared to poor in 2016. The River Clyst is also assessed as of moderate ecological quality, though this has consistently varied between poor and moderate since 2013. Whilst all three rivers have historically

²³ Environment Agency (2020) Catchment Data Explorer [online] available at: <https://environment.data.gov.uk/catchment-planning/>

had good chemical status, the most recent assessments in 2019 identify that chemical conditions have deteriorated due to increased phosphorus and dissolved oxygen as a result of point source pollution from the water industry and urban development/ transportation, as well as diffuse source pollution from agriculture and rural land management. Natural drought has also affected the ecological and chemical quality of the River Clyst.

- 5.48 The Broadclyst NP proposes two sites which are partially within or adjacent to the flood zones of these rivers, where ultimately there is a potential to affect water quality (Policies H2 and EC2). This is recognised by the provisions of Policy DC3, which requires a net reduction of surface run off and the prioritisation of natural flood management measures in development, and states that additional benefits should be sought, including “*water treatment and the removal of pollutants*”. Development proposals are therefore expected to contribute to improved water management on-site, which maintains or improves water quality. As a result, minor long-term positive effects are anticipated.
- 5.49 The South West Water Water Resources Management Plan²⁴ identifies that Broadclyst Parish lies within the Wimbleball Water Resource Zone (WRZ) supported by Water Treatment Works north of Exeter and the Otter Valley groundwater sources. Wimbleball Reservoir supports augmentation releases to the River Exe, where abstractions also occur near Tiverton and Exeter. With surplus water availability anticipated up to at least 2050, the allocations of the Broadclyst NP are not considered likely to lead to any significant detrimental effects in relation to the availability of water resources.
- 5.50 Considering the above, a mixture of both positive and negative effects is anticipated overall in relation to this SEA theme. The benefits of a regeneration/ brownfield-led economic and mixed-use development strategy are recognised, however; the overall loss of greenfield land, and potentially high-quality (‘best and most versatile’) agricultural land through the proposed housing allocation sites is likely to lead to **permanent minor negative effects**. In relation to water quality, the policy provisions which seek water quality improvements and flood and drainage management are considered likely to lead to **minor long-term positive effects**.

Population and Community

- 5.51 The strategic context of the EDLP proposes significant growth in the wider vicinity of the parish east of Exeter, including associated with Cranbrook. The Broadclyst NP seeks to provide sustainable growth locations to support the needs of the local population, and an ageing population with housing needs that are largely not met through the existing housing stock. Housing and employment sites are proposed (Policies EC1-3 and H1–H3) that will support targeted growth with enhanced local accessibility.
- 5.52 Policy H4 outlines social and affordable housing expectations for development at the allocated sites, as well as any development coming forward on non-allocated sites in the parish. Significantly, development at the allocated sites in the Broadclyst NP is expected to deliver 50% affordable housing, split equally between affordable tenures and social rental houses in perpetuity.

²⁴ South West Water (2014) Water Resources Management Plan [online] available at:
https://www.southwestwater.co.uk/siteassets/documents/water_resources_management_plan_june_20141.pdf

Development outside of the allocation sites is expected to “*provide an appropriate mix of dwellings to respond to the need for specific tenures*”, providing at least 25% of the dwellings for social rental houses in perpetuity. The policy outlines a local connection hierarchy in accessing the affordable housing, which will support local communities in accessing their housing needs. The additional homes and targeted affordable housing provisions are considered likely to lead to long-term significant positive effects.

- 5.53 The parish has good access to Exeter which provides a significant range of services, facilities and employment opportunities. However, the Plan recognises a lack of local community facilities in some of the smaller settlements, including; Broadclyst Station, Westclyst and Blackhorse. Minor positive effects are anticipated as a result of the allocation at Broadclyst Station in this respect, as Policy H2 outlines the requirement to deliver a new children’s play park and identifies that “*provision of two community facilities benefitting Broadclyst Station are to be taken into consideration in site viability*”.
- 5.54 Community consultation through the development of the Broadclyst NP has identified a community preference for improved access to both a swimming pool and sports/ gym facilities. In direct response, the Broadclyst NP proposes a suitable site (Policy CF1) for development of a Community Sports Hub. Policy CF2 also provides support for new indoor and outdoor sports and recreation facilities, which should be accessible by a range of modes of transport and deliver an overall gain of community space.
- 5.55 Accessibility is a key contributor to the quality of life of residents. In this respect improvements to sustainable transport linkages will enhance access to key services and facilities across the parish and to surrounding service centres, including Exeter and Cranbrook. For example Policy T2 seeks to safeguard land for the delivery of a new bridge providing direct access to Cranbrook Station over the Waterloo railway line. The enhanced connections will boost accessibility not only to rail links, but also the developing service and facility offer in the new town. The bridge will also enhance safe access to Broadclyst Station and long-term positive effects are anticipated.
- 5.56 Where appropriate, development at the proposed site allocations is expected by the Neighbourhood Plan to connect to strategic routes such as the Exeter – Cranbrook cycle route. Policy T1 also outlines support for the development of a safe pedestrian and cycle route between Broadclyst village and Broadclyst Station. This is expected to support accessibility to services, facilities and employment and educational opportunities. Long-term positive effects are anticipated as a result. Active travel infrastructure for commuting and leisure is also promoted through Policy T4 and support is also provided for live-work units (Policy H8). This will help enhance self-containment and reduce the effects of development on local roads and infrastructure (e.g. through reduced commuting). Policies DC5, DC6 and T5 also have a close focus on to improving community infrastructure.
- 5.57 Further positive effects in relation to communities are anticipated as a result of the policy provisions which seek to retain and enhance landscape character (Policies D1, DH1 and NE5), protect the historic environment and build upon local heritage values (Policies DH1 – DH4) and promote high-quality design (Policy D1).

5.58 Considering the above, **significant long-term positive effects** are anticipated overall in relation to the Population and Community SEA theme.

Health and Wellbeing

5.59 Whilst the Plan area has a wealth of natural assets supporting good health and recreational access, community consultation undertaken during the development of the Broadclyst NP has identified that there is demand for a swimming pool and new sports/ gym facilities to be delivered in the parish. Furthermore, the smaller settlements such as West Clyst, Broadclyst Station and Blackhorse have restricted access to local community facilities and active travel networks.

5.60 In response to this the proposals of the Neighbourhood Plan place significant emphasis on the delivery of community benefits alongside housing and employment growth to maximise sustainable development and balanced communities. Notably, in relation to health and wellbeing this includes the new Community Sports Hub and new and enhanced sports, recreation and community facilities (Policies CF1 and CF2) and a new garden centre at the Crannaford site (Policy EC2). Furthermore, Policies NE1, NE2, and NE6 provide protections for areas of woodland and local green space which support the recreational offer in the Plan and seek to extend these networks where appropriate. On this basis, the Broadclyst NP is considered likely to support enhancements to green infrastructure provision in the parish, with long-term positive effects.

5.61 The proposed policy framework seeks to enhance active travel opportunities, both within the parish and in connections with the surrounding areas. In particular, Policy T2 seeks to safeguard land for the delivery of a new bridge providing direct access to Cranbrook. The enhanced connections will boost accessibility, not only to sustainable transport, but also the developing service and facility offer in the new town, including medical facilities. The bridge will also enhance safe access to Broadclyst Station, and promote healthier modes of travel such as walking and cycling. This has the potential to lead to long-term positive effects for residents' health and wellbeing.

5.62 Where appropriate, development at the proposed site allocations is expected by the Neighbourhood Plan to connect to strategic routes such as the Exeter – Cranbrook cycle route, and furthermore, Policy T1 outlines support for the development of a safe pedestrian and cycle route between Broadclyst village and Broadclyst Station, providing better and safer connections between these areas of the parish.

5.63 Considering the support that the Broadclyst NP provides for increased access to leisure and recreational opportunities, as well as active travel opportunities which better connect areas of the parish and improve strategic connections, **significant long-term positive effects** are considered likely overall in relation to the Health and Wellbeing SEA theme.

Transportation

5.64 Whilst the parish area has relatively good road connections with Exeter, particularly via the B3181 and London/Honiton Road it is noted that local roads

are often single-track lanes with pull-in areas. These roads are struggling to cope with a growing population and are often affected by flooding. The B3181 and London/Honiton Road are also under significant pressures due to the city's strategic growth and expansion.

- 5.65 Whilst the growth in the parish proposed through the Broadclyst NP has the potential at some locations to negatively affect the existing road network in terms of capacity, there have been recently been significant enhancements in transport networks in the vicinity of the parish, including associated with the opening of Cranbrook railway station in December 2015, the Clyst Honiton bypass and enhancements to local cycle route networks.
- 5.66 The Broadclyst NP supports further key transport and connectivity enhancements that are considered likely to bring about significant benefits in terms of increased accessibility in the parish. In this respect Policy T2 safeguards land for the delivery of a new bridge over the Waterloo – Exeter railway line which will enable safe pedestrian and cycle movement and improved access to Broadclyst Station and Cranbrook. The bridge will significantly enhance active travel connections to Cranbrook railway station from the north of the parish, including potential development areas. Significant long-term positive effects are considered likely as a result of the bridge proposal.
- 5.67 Policy T1 supports the development of a safe pedestrian and cycle route between Broadclyst village and Broadclyst Station. This will enhance the role of Broadclyst village as a service centre through improving access to key facilities such as Clyst Vale Community College, Broadclyst Primary School and Broadclyst Surgery. It is also likely to enhance access to Killerton House and Ashclyst Forest. Further development of this route to the south is also anticipated to enhance connections with Cranbrook town centre, Cranbrook railway station, Blue Hayes Primary School and Cranbrook Education Campus. The policy also recommends that proposals are aligned with the new bridge proposals to maximise strategic connections and access opportunities.
- 5.68 Active travel connections in the Plan area are further reinforced through the Neighbourhood Plan allocations and Policy T4. In this respect all the sites allocated in the Neighbourhood Plan are expected through policy provisions to ensure suitable access and provide for active travel connections, particularly to new areas of employment or recreational development. Policy T4 provides further support for route extensions and improvements and protects identified key routes from development. Furthermore, Policy T4 provides support for the development of 'low traffic neighbourhoods' with a network of safe crossings and quiet streets.
- 5.69 Under Policy T3, parking provision is also designed to adapt to, provide for, and prioritise more sustainable transport connections, which includes electric charging points for vehicles, scooters and bikes and covered storage facilities. Policy T3 is further supported by Policy T5 which supports proposals to "*expand an electric transport network around and through the Parish*". This includes: electric travel rental businesses; electric stations for parking and charging; security systems for bike and vehicle pool schemes; and effective signage.

- 5.70 Support is also provided for live-work units (Policy H8) and mixed-use development. Through promoting self-containment, this will help reduce the need to travel, and will help limit the effects of development on local roads and infrastructure (e.g. through reduced commuting).
- 5.71 The significant support provided through the Broadclyst NP for improvements to the parish's sustainable transport networks and enhancements in linkages with surrounding areas is considered likely to lead to **significant long-term positive** effects overall.

Conclusions at this stage

- 5.72 The assessment has concluded that the re-submission version of the Broadclyst NP 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 and facilitating enhancements to community facilities and employment opportunities in the parish. In this context the Neighbourhood Plan's proposals are considered likely to have significant potential to improve the quality of life of residents and promote community vitality.
- 5.73 The Neighbourhood Plan's focus on active travel enhancements, particularly in terms of facilitating strategic pedestrian and cycle network connections (including through the delivery of a new bridge over the railway line to Cranbrook) are also considered likely to lead to significant positive effects in relation to the 'Transportation' SEA theme. These active travel enhancements, alongside measures to enhance sports, recreation and leisure offer in the parish, are also considered likely to lead to long-term positive effects in relation to the 'Health and Wellbeing' SEA theme.
- 5.74 With regards to the 'Land, Soil and Water Resources' SEA theme, the housing allocations and new Community Sports Hub proposed through the Neighbourhood Plan will take place on greenfield land which has the potential to be classified as the best and most versatile agricultural land. This is likely to lead to the loss of productive agricultural land and minor long-term negative effects can be anticipated in this respect. The regeneration of key previously developed opportunity sites in the parish for new tourism, employment and mixed-uses will however lead to positive effects in terms of efficient land use.
- 5.75 In relation to the 'Climate Change' theme, the Neighbourhood Plan seeks to support the sustainable management of surface water run-off and flood risk, deliver energy efficient development, facilitate renewable energy provision and encourage sustainable transport and electric vehicle use. In terms of 'Biodiversity' SEA theme the Neighbourhood Plan has a strong focus on the protection and enhancement of the green infrastructure assets in the Plan area (including woodland areas) and seeks to facilitate enhancements to habitats and ecological networks. This includes through embedding the principle of biodiversity net gain. As such, long-term positive effects are anticipated in relation to both the 'Climate Change' and 'Biodiversity' SEA themes.
- 5.76 In terms of the 'Historic Environment' SEA theme, the earlier Neighbourhood Plan site allocation at Silverton Mill had the potential to have impacts on the historic environment, however, this site is no longer included as an allocation in

the Neighbourhood Plan. More broadly, the historic sensitivities of the parish are recognised through the Neighbourhood Plan policies, which seek to limit adverse impacts, facilitate enhancements to the fabric and setting of heritage features, and support heritage-led regeneration of key opportunity sites.

- 5.77 With regards to the 'Landscape' SEA theme, whilst the greenfield development taken forward through the Neighbourhood Plan's residential allocations is likely to lead to minor negative effects on local character, the Broadclyst NP policies otherwise provide a robust basis for the protection and enhancement of landscape character in the parish.

6. What are the next steps?

- 6.1 This Environmental Report accompanies the Broadclyst Neighbourhood Plan for re-submission to the Local Planning Authority, East Devon District Council, for subsequent independent examination.
- 6.2 At independent examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the East Devon Local Plan.
- 6.3 If independent examination is favourable, the Neighbourhood Plan will be subject to a referendum, organised by East Devon District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Broadclyst Neighbourhood Plan will become part of the development plan for Broadclyst Parish.

Appendix A Context review and baseline information

A.1 Environmental quality

Policy context

National

The UK's Air Quality Strategy²⁵ details a long-term vision for improving air quality in the UK, which involves objectives and policies for the different pollutants and the environmental implications associated with these.

Key messages from the National Planning Policy Framework²⁶ (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.'
- Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'²⁷ sets out a number of 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.

²⁵ DEFRA (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf [accessed 20/05/19]

²⁶ MHCLG (2019) 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]

²⁷ 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 20/05/19]

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 take action 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 District as highlighted in the 2019 Annual Status Report (ASR)²⁸.

Despite this, some areas within the Plan area are more susceptible to the effects of potential air and/or noise pollution. Land adjacent to the main strategic road networks within the Neighbourhood Plan area, including the M5, which runs directly through the north western part of the parish is susceptible to the pollutants and causing disturbances to residents.

As of April 2020, no comprehensive noise pollution studies spanning over the Neighbourhood Plan area have been conducted. Broadclyst village centre is located approximately 3km from the Exeter Airport (as the crow flies). In 2001 an independent appraisal²⁹ into the impact of Exeter Airport's noise pollution status as prepared for East Devon District Council for two sites located just south of the plan area indicated that both sites demonstrated decibel levels in line with standards acceptable for development.

Future baseline

New housing and employment provision taken forward within the parish and the wider area, including through the East Devon Local Plan, has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as NO₂. However, this is unlikely to lead to exceedances of air quality objectives in the Neighbourhood Plan area.

Exeter Airport's proximity to the Neighbourhood Plan area has impacts on noise quality for some residents as Broadclyst is overflown by aircraft arriving at the airport. However, this affects the whole Neighbourhood Plan area equally, and will

²⁸ 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].

²⁹ Bickerdike Allen Partners (2001): 'East Devon District Local Plan Proposed Residential Developments Around Exeter Airport' [online] available to download from:

https://eastdevon.gov.uk/media/1711156/eddc_local_plan_report_proposed_residential_developments_around_exeter_airport_july_2001_ref_a5441_r2a.pdf [accessed 01/04/20].

therefore not inform spatial choices about the location of future growth through the Neighbourhood Plan.

A.2 Biodiversity

Policy context

National

The EU Biodiversity Strategy³⁰ was adopted in May 2011 in order to deliver an established new Europe-wide target to ‘halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020’.

Key messages from the National Planning Policy Framework³¹ (NPPF) include:

- 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 ‘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 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.

³⁰ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244&from=EN> [accessed 06/04/20]

³¹ MHCLG (2019) 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 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 Natural Environment White Paper (NEWP)³² sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal wellbeing. It was in part a response to the UK's failure to halt and reverse the decline of biodiversity by 2010, and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature. It includes commitments to:

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

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy; the 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services'³³ (2013) aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.

The 25 Year Environment Plan³⁴ (2018) sets out the Government's environmental plan of action over the next quarter century.. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;

³² HM Gov (2011) The Natural Choice: securing the value of nature [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf [accessed 20/05/19]

³³ DEFRA (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf [accessed 14/04/20]

³⁴ 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 14/04/20]

- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

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 the Biodiversity SEA theme.

Local

The South-East Devon European Site Mitigation Strategy³⁵ 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.

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 Broadclyst include:

- Exe Estuary Special Protection Area (SPA) and Ramsar site, approximately 7km from Broadclyst village centre
- East Devon Pebblebed Heaths Special Area of Conservation (SAC), approximately 9km from Broadclyst village centre

This is of significance as Broadclyst 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).

In this context, the Clyst Valley Regional Park is a significant feature of the Neighbourhood Plan area as it provides strategic scale SANGs. The CVRP is a “10km commuting and recreational trail” which contributes to strategic mitigation of recreational pressure on the above mentioned SPA and SAC.³⁶

There is one Site of Special Scientific Interest (SSSI) that falls within the Neighbourhood Plan area, Killerton SSSI. The site covers much of Killerton Park (75.4 ha) and the quarries therein, and is one of the more accessible examples of Permian basalt-like rocks known as lamprophyres. The lamprophyres here are typical biotite-phyric minettes and although field relationships are often obscure, they are considered to be lava flows rather than the usual dyke-like bodies seen elsewhere³⁷. All of the site is currently in a ‘favourable’ condition³⁸.

Several County Wildlife Sites are present within the plan area. These are listed by the Devon Biodiversity Records Centre³⁹ as follows:

- **Killerton Park** (202.5 ha), is a parkland with ancient and secondary broadleaved woodland. Species present within the area include the saxiproxylic invertebrate, bat and lichen. See **Chapter 6** for more information about the historic park.
- **Ashclyst Forest** (387 ha), is owned by the National Trust, and is set within the Killerton Estate, a large 18th century home in surrounding parkland (see **Chapter 6**). The forest is one of the largest woods in East Devon⁴⁰, and is known for housing a variety of wildlife, including deer, insects (in spring), nesting birds and flowers. The forest itself is comprised of mixed woodland, including broadleaved, deciduous and conifer trees. Over different 30 species of butterfly⁴¹ have been observed within the grounds, including:
 - The pearl-bordered fritillary
 - Silver-washed fritillary
 - The purple hairstreak
 - The white admiral
- **Higher Combeory Farm** (5.9 ha), is an unimproved marshy grassland.
- **Poundapit and Oakham Coppices** (10.2 ha), is an ancient, semi-natural broadleaved woodland, new broadleaved tree planting and conifer plantation.
- **Bampfyld Copse** (3.5 ha), contains areas of small ancient woodland and wet woodland.

³⁶ Exeter and East Devon Growth Point (2020) [online], available from: <https://www.exeterandeastdevon.gov.uk/Sustainable-Growth/>

³⁷ Natural England (2020): ‘Killerton SSSI’ [online] available from: <https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1002682.pdf> [accessed 01/04/20].

³⁸ Natural England (2020): ‘SSSI condition summary’ [online] available from: <https://designatedsites.naturalengland.org.uk/ReportConditionSummary.aspx?SiteCode=S1002682&ReportTitle=Killerton%20SSSI> [accessed 01/04/20].

³⁹ Devon Biodiversity Records Centre (2015): ‘Wildlife site resource map and species information for neighbourhood planning – Broadclyst Parish’ [online] available to download from: <https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Reference%2BDocuments&start=10> [accessed 10/04/20].

⁴⁰ National Trust (n.d.): ‘Ashclyst Forest’ [online] available from: <https://www.nationaltrust.org.uk/killerton/features/ashclyst-forest> [accessed 05/03/20].

⁴¹ Devonlife (2013): ‘The Wildlife of Ashclyst Forest’ [online] available from: <https://www.devonlife.co.uk/out-about/wildlife/the-wildlife-of-ashclyst-forest-1-1631570> [accessed 01/04/20].

- **Helling Park Fen** (9.8 ha), is a rush pasture and lowland fen site with some areas of scrub woodland and a pond.
- **Mincimore Copse** (4.3 ha), is a secondary broadleaved woodland.
- **Great Barton Farm** (4.6 ha), is an unimproved marshy grassland.

In addition to the habitats mentioned in the sites above, records contain a variety of developmental control species⁴², deemed of high safeguarding priority during the planning process. This extensive list includes a variety of bats, owls, snakes, newts, mice, badgers and mice. Invasive species such as Japanese knotweed, giant hogweed and Himalayan balsam are also present within the plan area.

With regards to local wildlife, Broadclyst Community Farm Orchard is an area of local wildlife, managed by the National Trust which hosts 32 acres of grass and vegetable growing land. Danes Wood is a woodland area, home to ancient chestnuts, oaks, redwoods and rhododendron. Other areas of notable local biodiversity are presented in **Figure A.1**.

The Biodiversity Report identifies a large number of Other Sites of Wildlife Interest (OSWI), defined as sites that possess significant wildlife interest within the local context, but do not reach the criteria for County Wildlife Sites. Unconfirmed Wildlife Sites (UWS) are those which are identified as having possible wildlife interest, but have not been fully surveyed. These sites are presented in **Figure A.1** below.

Future Baseline

Habitats and species will potentially face increasing pressures from future development within the 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, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

County Wildlife Sites act as wildlife corridors and have the potential to be impacted by new development which can remove the connection between habitats for species such as birds. Ecological sites can also be impacted by poor air quality and water quality, and factors such as noise and lighting can disturb vulnerable species.

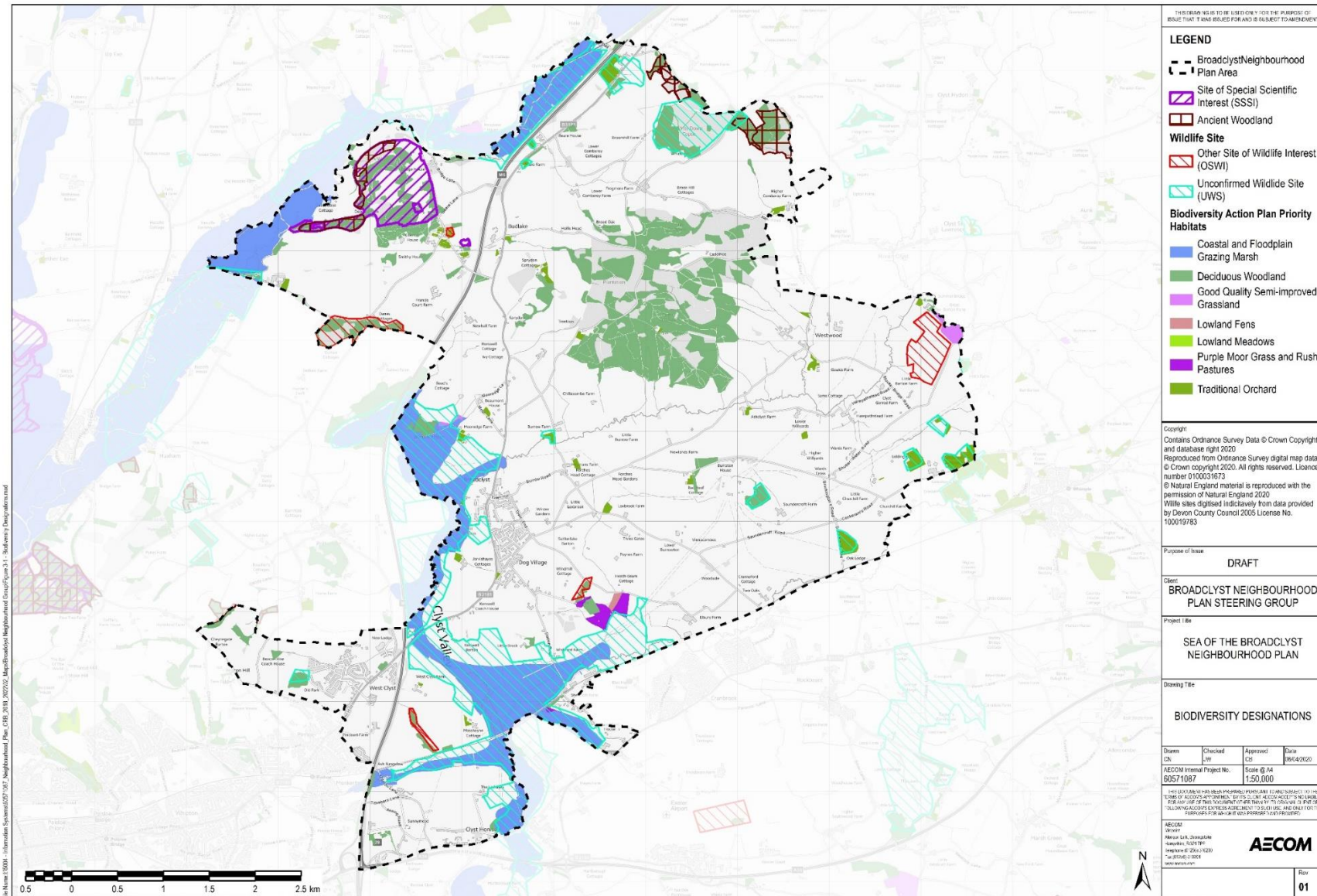
The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance priority habitats but maintain the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised, both within the Plan area and in the surrounding areas.

Development in Broadclyst 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 sufficient strategic Suitable

⁴² Devon Biodiversity Records Centre (2015): 'Wildlife site resource map and species information for neighbourhood planning – Broadclyst Parish' [online] available to download from: <https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Reference%2BDocuments&start=10> [accessed 01/02/20].

Alternative Natural Greenspace (SANGs) without the need for further additional mitigation.

Figure A.1: Biodiversity designations



A.3 Climate change

Policy context

National

Key messages from the National Planning Policy Framework⁴³ (NPPF) include:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account 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, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- 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.

The Flood and Water Management Act (2010)⁴⁴ 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;

⁴³ 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].

⁴⁴ Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents> [accessed 02/03/20].

roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The UK Climate Change Act⁴⁵ 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 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 Committee of Climate Change published a 2012 report entitled 'How Local Authorities Can Reduce Emissions and Manage Climate Change Risk'⁴⁶ 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 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 Assessment, the Adaptation Sub-Committee commissioned

⁴⁵ HM Government (2008): 'Climate Change Act 2008' [online] available at: <http://www.legislation.gov.uk/ukpga/2008/27/contents> [accessed 02/04/20].

⁴⁶ 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 02/04/20].

an evidence report⁴⁷ 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 Strategy⁴⁸, 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 2019⁴⁹.

At the local level, the East Devon Climate Change Strategy (2020- 2025)⁵⁰ 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.

⁴⁷ 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 02/04/20].

⁴⁸ 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 02/04/20].

⁴⁹ 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].

⁵⁰ 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].

Key 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.

Summary of baseline

Current Baseline

Following the success of the UK Climate Projections released in 2009 (UKCP09), the Met Office recently released the UK Climate Projections for 2018 (UKCP18).⁵¹ 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 follows⁵²:

- 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:

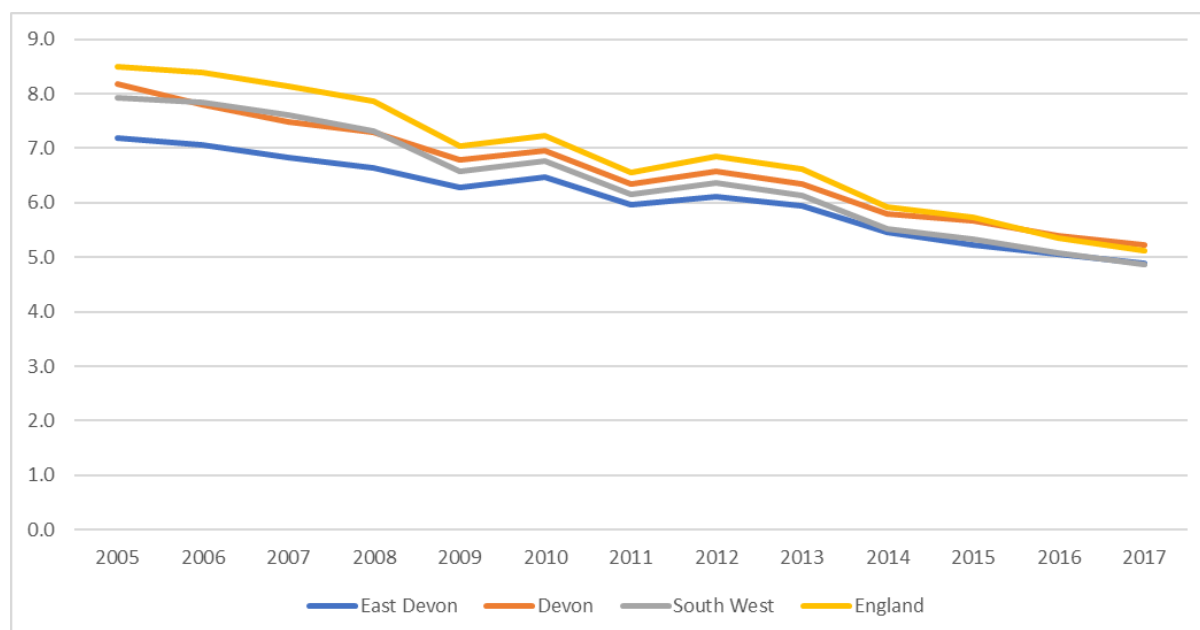
- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems 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;

⁵¹ Data released 26th November 2018 [online] available at: <https://www.metoffice.gov.uk/research/collaboration/ukcp> [accessed 04/04/20].

⁵² 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> [accessed 13/04/20]

- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

Figure A.2: Per capita CO₂ emissions (t) 2005- 2017



CO₂ emissions from the built environment are monitored and recorded at Local Authority level.⁵³ **Figure A.2** shows that CO₂ emissions in East Devon have declined

⁵³ 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 09/04/20].

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 form of production of CO₂ is sourced from gas.

Fluvial flood risk is highest in the western part of the Neighbourhood Plan area (see **Figure A.3**), including a high risk (probability > 1 in 100 of flooding within the area) of flooding, localised to broad corridors in the north and south west. This broadly follows the south westerly direction of the River Clyst, which flows through the northern part of the Plan area towards Topsham, near Exeter. The River Culm, which traverses the north-westernmost side of the Plan area presents additional high-risk fluvial flooding scenarios. However, risk is much lower in the village centre, with settlements of the Plan area being shielded from high-risk scenarios.

Figure A.3: Fluvial flood risk (approximate plan area in red)

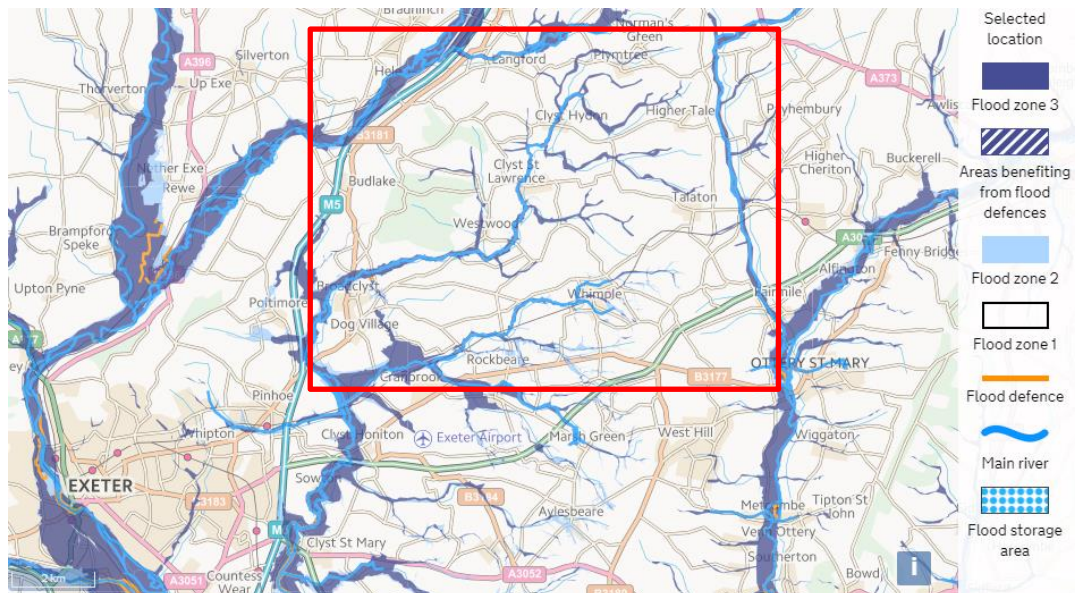


Figure A.4: Surface water flooding (approximate plan area shown in red)

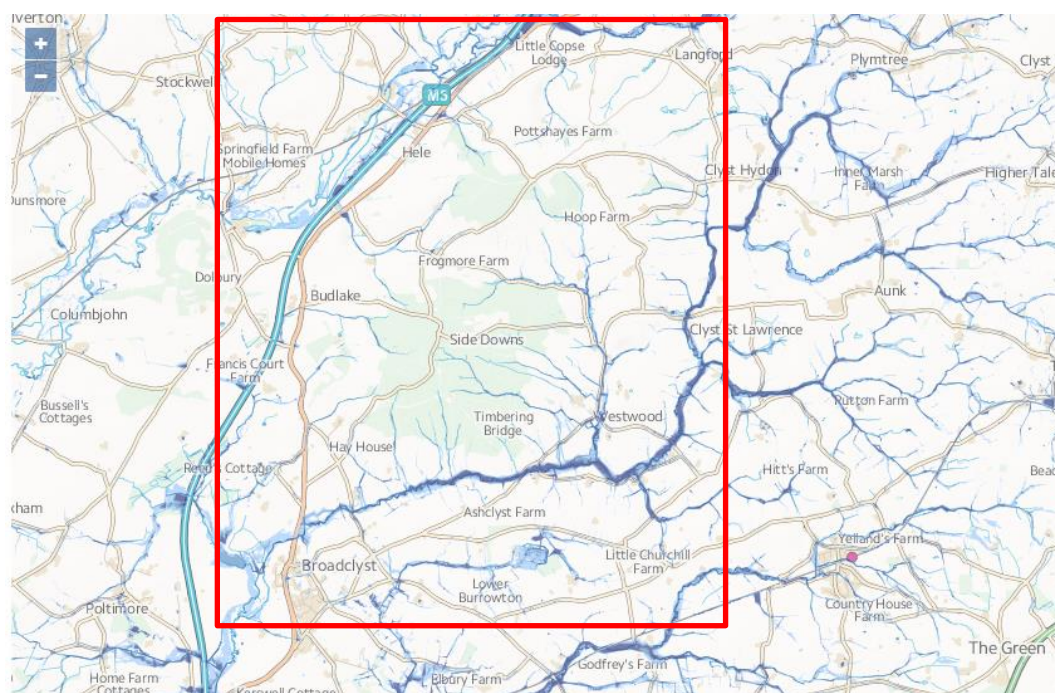


Figure A.4 demonstrates that surface water flooding in Broadclyst is extensive, distributed through narrow thin but localised ribbons following streams and tributaries within the Neighbourhood Plan area. However, areas of high risk are mostly concentrated on eastern sides of the plan area, following the flow of the River Clyst along the Clyst Valley. The settlement itself is unlikely to be strongly affected by surface water flood risk due to this localisation.

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. This is significant within this Plan area given the presence of two main watercourses: The River Culm and River Clyst. 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 Broadclyst 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, hedgebanks 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 Assessment (LCA) describes the variations in character between different types of area and landscape in the County. The Broadclyst 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:

- A range of settlements and building styles
- 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.

At the local level, the Broadclyst Landscape Assessment⁵⁴, notes that the area is set with an attractive rural landscape, most of the land surrounding the settlement is

⁵⁴ Broadclyst Neighbourhood Parish (online) Broadclyst Landscape Assessment [online] available from: <https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Reference%2BDocuments&start=0> [accessed 11/04/20].

owned by the National Trust. The broad floodplain of the River Clyst sweeps around the village to the north and west.

Additionally, The National Trust commissioned LUC in 2012 to prepare the Killerton Setting Study⁵⁵ alongside a Parkland Management Plan in order to understand the contribution of the setting to the significance of Killerton Park and to explore its sensitivity to change. The study indicated that the setting of Killerton has been greatly influenced over time by increasing population, industrial and housing development and changing agricultural land use and management. The impact of future development (residential and employment) and supporting infrastructure has the potential to impact the setting in the following manner:

- Visual impact through creating urbanised or industrial blocks of land use within the predominantly rural character of the landscape.
- Night time light pollution from large areas of development.
- Perceptual impact beyond direct visual changes, such as the change of residents' understanding of the historical setting of the Park within a large rural estate and small nucleated villages.

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 and the Killerton setting. In particular, large scale development has the potential to disrupt existing dispersed settlement patterns within the Plan area. 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, including within the setting of the Killerton Estate, that enhances the village setting, delivering green infrastructure improvements and new recreational opportunities and enhanced framing of key views.

A.5 Historic environment

Policy context

National

Key messages from the National Planning Policy Framework⁵⁶ (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

⁵⁵ LUC (2012): 'Killerton Setting Study' [online] available from: <https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Reference%2BDocuments&start=10> [accessed 11/04/20].

⁵⁶ 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].

environment and 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 or less than substantial harm to its significance.

These messages are supported by the national Planning Practice Guidance (PPG)⁵⁷ 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.⁵⁸ 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.⁵⁹

The Government’s Statement on the Historic Environment for England⁶⁰ 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

⁵⁷ Department for Communities and Local Government (2012) National Planning Practice Guidance [online] available at: <http://planningguidance.communities.gov.uk/> [accessed 03/03/20].

⁵⁸ 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].

⁵⁹ 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].

⁶⁰ 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

the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁶¹ directly relates to the Historic Environment.

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)⁶² 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)⁶³ 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)⁶⁴ 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.

⁶¹ 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].

⁶² 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].

⁶³ 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].

⁶⁴ 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].

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)⁶⁵ 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.

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.

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 141 listed buildings within the Plan area, of which 2 are listed as Grade I, 8 are Grade II*, as follows:

- Parish Church of St John the Baptist (Grade I)
- Chapel of the Holy Evangelists (Grade I)
- Marker's Cottage (Grade II*)
- Paddleford Bridge (Grade II*)
- Ellerhayes Bridge (Grade II*)
- The Bear's Hut 220 Meters North, North West of Killerton House (Grade II*)
- Old Park (Grade II*)
- Newhall Farmhouse and Ha Ha to Rear (Grade II*)

⁶⁵ 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].

- Killerton House and Ha Ha Approximately 20 Meters in Front of Entrance (Grade II*)

The remaining 128 buildings are listed as Grade II. None of these are designated to be 'at risk' by Heritage England. **Figure A.5** shows the location of these assets.

With regards to local history, Broadclyst was formerly linked first with the Drewes then the Aclands at Columbjohn and Killerton from the sixteenth century to the present. Apart from the village itself, the population was scattered in a few small hamlets and many isolated farmsteads. The Aclands still reside in Killerton, but Sir Richard Acland handed over the House and Park to the National Trust in 1944. Due to this influence, the village is now one of the best preserved of the large Devon estates, with many typical village, hamlet and farm buildings, which have not as of yet been unduly compromised by development pressure.⁶⁶

The Broadclyst Conservation Area is relatively small in relation to the village as a whole, and covers only the northern part of the village centre. It was first designated by Devon County Council in 1974, with little change since. Many of the earlier houses within the conservation area are examples of vernacular buildings of both spacious and compact layout, and special complexity from the combination of both large and small spacing.

Of particular local significance is the site of the Killerton Estate, which is home to Killerton House (Grade II*)⁶⁷, and its surrounding garden, which is designated as a Registered Park and Garden by Historic England (Grade II*). In 1944, Sir Richard Acland donated the estate, with over 6400 acres, including working farms and 240 cottages, to the National Trust. It is the distinctive "yellow cottages" that give Broadclyst its own unique character. In addition to its heritage, the site possesses local significance due to its remarkable character: the site has wide views in all directions from the high ground north of the House, together with significant views south-west, south and south-east from the House and terrace, framed by Ashclyst Forest to the south-east and Danes Wood to the south-west, which are outside the site boundary.

The Plan area has two scheduled monuments, as follows:

- **Dolbury Hillfort, 230m North of Killerton House**, a univallate hillfort (with one raised edge surrounding its depression) constructed during the Iron Age. The Hillfort survives well, due to its rarity nationally, and historical significance in understanding Bronze and Iron age communities, the site is currently designated⁶⁸. Further, its position within the setting of Killerton Estate.
- **Sections of two deer park pales and watering Pond in Killerton Park**, dated from the early 18th century⁶⁹. The history and evolution of the deer park is well documented both historically and archaeologically which enhances our understanding and significance of Killerton's deer park.

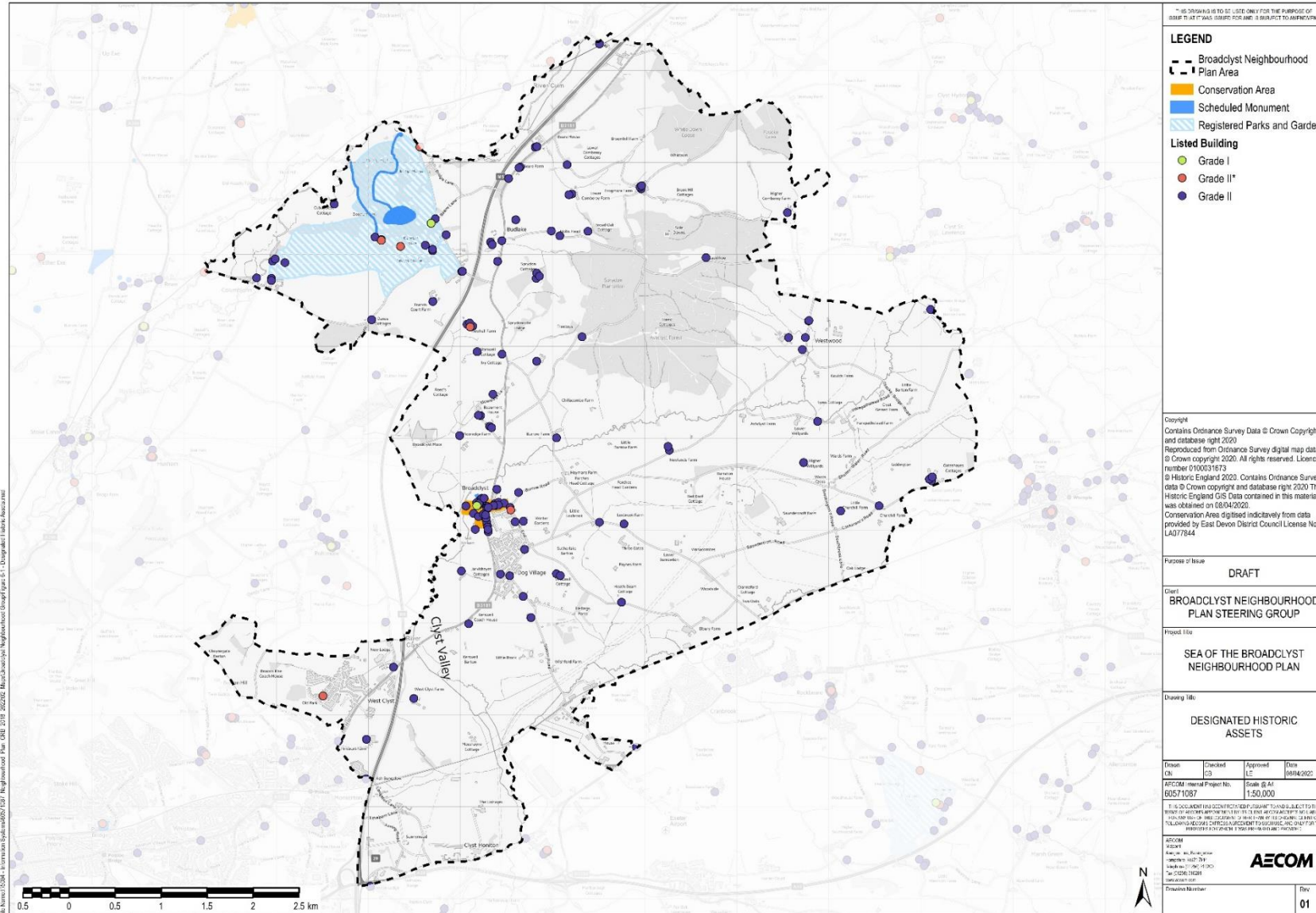
⁶⁶ East Devon District Council (1999): 'Broadclyst' [online] available from: <https://eastdevon.gov.uk/media/555895/broadclystca.pdf> [accessed 14/04/20].

⁶⁷ Historic England (n.d.): Killerton House, Broadclyst [online] available from: <https://historicengland.org.uk/listing/the-list/list-entry/1000694> [accessed 14/04/20].

⁶⁸ Historic England (2018): 'Donbury Hillfort, 230 meters North of Killerton House' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV1312&resourceID=104 [accessed 14/04/20].

⁶⁹ Historic England (2018): 'Sections of two deer park pales' [online] available to download from: <https://historicengland.org.uk/listing/the-list/list-entry/1017193> [accessed 14/04/20].

Figure A.5: Historic environment designations



The Historic Environment Record (HER) for Devon⁷⁰ reveals a key information source for the known archaeology, historic buildings and historic landscape features within the county. **Figure A.6** maps the HER monuments within the approximate plan area. A number of non-designated assets with local historic merit are clustered around the historic core of Broadclyst village. The Balloon Barrage Flight Headquarters was located in Broadclyst during the World War II period of 1939 to 1945, whose heritage site is situated outside the Broadclyst conservation area. Other non-designated assets which are situated within the conservation plan area range from memorial/commemorative monuments (such as the Broadclyst Victory Hall⁷¹) to medieval cottages⁷², to the remains of manors⁷³.

Outside of the central village area are several more sparsely distributed non-designated assets with local historical significance. The following non exhaustive list demonstrates the variety of these findings:

- Orchards of mediaeval origin (such as the Orchards East of Sprydons Cottages⁷⁴ in the north of the Plan area)
- Field Boundaries dated from mediaeval to the 20th century (such as those in the north eastern region of the Plan area⁷⁵)
- Castles and their features⁷⁶ (such as the castle located to the east of Killerton Estate)
- Archaeological features (such as findings⁷⁷ around Saundercroft farm in the west)

⁷⁰ Devon County Council (n.d.): 'Historic Environment Record' [online] available to download from: <https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/> [accessed 11/04/20].

⁷¹ Historic England (2018): 'Broadclyst Victory Hall' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV107120&resourceID=104 [accessed 14/04/20].

⁷² Historic England (2018): 'Cottage non specific in the parish of Broadclyst' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV65131&resourceID=104 [accessed 14/04/20].

⁷³ Historic England (2018): 'Manor in the Parish of Broadclyst' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV19215&resourceID=104 [accessed 14/04/20].

⁷⁴ Historic England (2018): 'Orchards East of the Plan area' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV112856&resourceID=104 [accessed 14/04/20].

⁷⁵ Historic England (2018): 'Field Boundaries South West of Channons Farm' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV112567&resourceID=104 [accessed 14/04/20].

⁷⁶ Historic England (2018): 'Castle in the parish of Broadclyst' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV12352&resourceID=104 [accessed 14/04/20].

⁷⁷ Historic England (2018): 'Archaeology around Saundercroft farm' [online] available from: https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MDV103667&resourceID=104 [accessed 14/04/20].

Figure A.6: HER monument records in Broadclyst (location shown in pink)



Future Baseline

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.

Designated assets, including associated the Killerton Estate, are susceptible to impacts from future development and infrastructure schemes/initiatives. 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 the parish and better reveal assets' heritage significance.

A.6 Land, soil and water resources

Policy context

National

The EU's Soil Thematic Strategy⁷⁸ presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The EU Water Framework Directive⁷⁹(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 Framework⁸⁰ (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*

⁷⁸ European Commission (2006) Soil Thematic Policy [online] available at: <http://ec.europa.eu/environment/soil/index_en.htm> [accessed 20/05/19]

⁷⁹ 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]

⁸⁰ 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]

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.
- 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)⁸¹ 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 England⁸² (2009), which sets out a vision for soil use in England. Furthermore, the Water White Paper⁸³ 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

⁸¹ 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 15/04/20]

⁸² 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]

⁸³ 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 15/04/20]

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 England⁸⁴ 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 Plan⁸⁵ (2013) 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 Directive⁸⁶ (2008). 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.

Local

The Exeter and East Devon Water Cycle Study (2010)⁸⁷ 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 Plan⁸⁸ (2015) 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.

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.

⁸⁴ 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 15/04/20]

⁸⁵ 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]

⁸⁶ Directive 2008/98/EC

⁸⁷ Halcrow Group Limited (2010): 'Exeter and East Devon Water Cycle Study' [online] available to download from: <https://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/env030-watercyclestudy.pdf> [accessed 25/03/20].

⁸⁸ DEFRA & Environment Agency (2015) Water for life and livelihoods Part 1: South West river basin district River basin management plan [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718339/South_West_RBD_Part_1_river_basin_management_plan.pdf accessed 23/05/19]

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. Broadclyst is located within the South West River Basin District, specifically, the Devon East Management Catchment, and falls within the Operational Catchments: The Clyst and Culm Operational Catchment.

The Clyst and Culm Operational Catchment contains 19 water bodies. With regards to water quality within the plan area, **Table A.1** 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 A.1: Ecological and Chemical status of surface water bodies⁸⁹

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 one of the main waterbodies within the Plan area, which is one of the rivers identified in **Table 7.1**. The Clyst rises in the Blackdown Hills and joins the River Exe at Topsham. It spans across the northwest and central region of the Plan area. The Upper Clyst is identified as having an overall 'Poor' ecological status, and 'Good' chemical status. Reasons given for not achieving 'Good' ecological status are agriculture and rural land management and drought.

The Lower part of the River Culm (Culmhead- Exe) is the other main waterbody within the Plan area, and is also identified in **Table A.1**. The Culm skirts across the northern boundary of Killerton Park to join the River Exe on the north-western outskirts of Exeter. The Lower Culm is identified as having overall 'Poor' ecological status, and 'Good' chemical status. Reasons for not achieving 'Good' ecological status include agriculture and rural land management, the water industry and ecological discontinuity.

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.

The Devon Minerals and Waste Plan (2011- 2033)⁹⁰ indicates that the transportation of minerals within Devon is predominantly by road. Although there are no notable

⁸⁹ 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].

⁹⁰ Devon County Council (2017): 'Devon Minerals Plan' [online] available from: <https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Minerals%20policy%20documents/Devon%20Minerals%20Plan/Final%20Adopted%20Version/Devon%20Minerals%20Plan%202011->

waste or quarry sites within the Plan area, the M5/A38 transport corridor, which passes through the north and borders the south side of the Plan area, provides the main form of access to the following key mineral resources within the county:

- Industrial Minerals
- Crushed Rock Aggregates
- High-specification Aggregates

With regards to waste processing facilities, the closest recycling plants in the area are located on the outskirts of Exeter.

Much of East Devon, including the 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. **Figure 7.1** (below) shows the agricultural land classification for the approximate Plan area, and indicates that there are parcels of land which demonstrate 'excellent' quality (Grade 1), mostly concentrated around Broadclyst village centre and the western side of the Plan area. As such, there is potential for development proposed through the plan to result in the loss of the absolute highest quality 'best and most versatile' agricultural land. The remainder of the plan area is predominantly underlain by Grade 3 quality land. Additionally, there are limited areas of Grade 2 land of 'very good quality', condensed to the far north of the plan area.

Future Baseline

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 Framework⁹¹ (NPPF) include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment,*

[2033.pdf?&originalPath=aHR0cHM6Ly9kZXZvbmlnLnNoYXJlcG9pbmQuY29tLzpiOi9zL1B1YmtpY0RvY3MvUGxhbm5pbmVrVYyQk9fc1RHZ3RBdnMwRVczQ1Ywa1VCeVA3dE0zR3NTZ2VnYVRpcEZlWGxOZz9ydGltZT1CeikzRF9uZTEwZw">2033.pdf?&originalPath=aHR0cHM6Ly9kZXZvbmlnLnNoYXJlcG9pbmQuY29tLzpiOi9zL1B1YmtpY0RvY3MvUGxhbm5pbmVrVYyQk9fc1RHZ3RBdnMwRVczQ1Ywa1VCeVA3dE0zR3NTZ2VnYVRpcEZlWGxOZz9ydGltZT1CeikzRF9uZTEwZw](#) [accessed 01/04/20].

⁹¹ 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]

with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'

- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a *'sufficient choice of school places'* and taking a *'proactive, positive and collaborative approach'* to bringing forward *'development that will widen choice in education'*.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change⁹² (2013) warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better

⁹² Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf> [accessed 20/05/19]

addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

Policies contained in Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency and reducing pollution and waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁹³ (2018) directly relate to the Population and Communities SEA theme.

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).

Table A.2 (below) shows that the population of Broadclyst grew more slowly between the 2001 census and 2011 census in comparison to East Devon District, the South West region, and England as a whole.

⁹³ 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 20/05/19]

Table A.2: Population change between 2001- 2011

	Broadclyst	East Devon	South West	England
2001	2830	125520	4928434	49138831
2011	2962	132457	5288935	53012456
Population change (%)	4.66%	5.53%	7.31%	7.88%

Table A.3 outlines the distribution of ages across the plan area, district, region and nation as a whole. In comparison to figures for East Devon, the South West and England as a whole, Broadclyst has a larger subset of residents within the 45-59 age band. Further, Broadclyst has a higher proportion of residents within the 0-15 and 25-44 age bands than district averages. Overall, a large proportion of residents in Broadclyst (51.15%) are over the age of 44.

Table A.3: Age Band

Age Band	Broadclyst	East Devon	South West	England
0-15	17.96%	15.44%	17.58%	18.90%
16-24	8.47%	8.54%	11.29%	11.90%
25-44	22.42%	19.44%	24.61%	27.50%
45-59	24.24%	20.14%	20.10%	19.40%
60+	26.91%	36.43%	26.41%	22.30%
Total Population	2962	132457	5288935	53,012,456

Table A.4 indicates that, in Broadclyst, a higher proportion of the population are deprived in no dimensions (46.63%) in comparison to East Devon (44.44%), the South West (44.76%) and England (42.50%). Most of those households who are deprived are deprived in one dimension (35.55%). Levels of deprivation involving multiple dimensions are comparatively lower for Broadclyst than for the district, region and England as a whole.

Table A.4: Household Deprivation

Household Deprivation (%)	Broadclyst	East Devon	South West	England
Not Deprived				
Deprived in no dimensions	46.63%	44.44%	44.76%	42.50%
Deprived				
Deprived in 1 dimension	35.55%	35.32%	33.17%	32.70%
Deprived in 2 dimensions	15.26%	17.11%	17.59%	19.10%
Deprived in 3 dimensions	2.39%	2.89%	4.04%	5.10%
Deprived in 4 dimensions	0.17%	0.23%	0.44%	0.50%
Total deprived	53.37%	55.56%	55.24%	57.40%

Lower Super Output Areas (LSOAs)⁹⁴ 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. Broadclyst spans across three LSOAs, which are as follows:

- East Devon 006A
- East Devon 006B
- East Devon 006C

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:

⁹⁴ DCLG (2019): Indices of Deprivation Explorer' [online] available from: <
http://dclgapps.communities.gov.uk/imd/iod_index.html#> [accessed 10/03/20].

- **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.

In relation to the IMD 2019⁹⁵, 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. According to the most recent available data, the following rankings (**Table A.5**) are provided for Broadclyst's three LSOAs:

Table A.5: Indices of Multiple Deprivation for Broadclyst LSOAs

Column heading	006A	006B	006C
Overall IMD	50% least deprived	50% least deprived	40% least deprived
Income Deprivation	30% least deprived	50% most deprived	50% least deprived
Employment Deprivation	30% least deprived	40% least deprived	50% least deprived
Education, Skills and Training	30% least deprived	50% least deprived	50% least deprived
Health Deprivation and Disability	30% least deprived	10% least deprived	20% least deprived
Crime	50% least deprived	30% least deprived	10% least deprived
Barriers to Housing and Services	20% most deprived	30% most deprived	30% most deprived
Living Environment Deprivation	10% most deprived	30% most deprived	30% most deprived
Income Deprivation Affecting Children	40% least deprived	40% most deprived	50% least deprived
Income Deprivation Affecting Older People	30% least deprived	40% least deprived	20% least deprived

Figure A.7 shows that most residents in Broadclyst own their homes outright (70.76%), lower than figures for East Devon, but higher than those for the South West (67.43%) and England as a whole (63.30%). In comparison, the proportion of residents who rent their homes (26.60%) is higher than figures for the district (22.95%),

Figure A.7: Housing Tenure

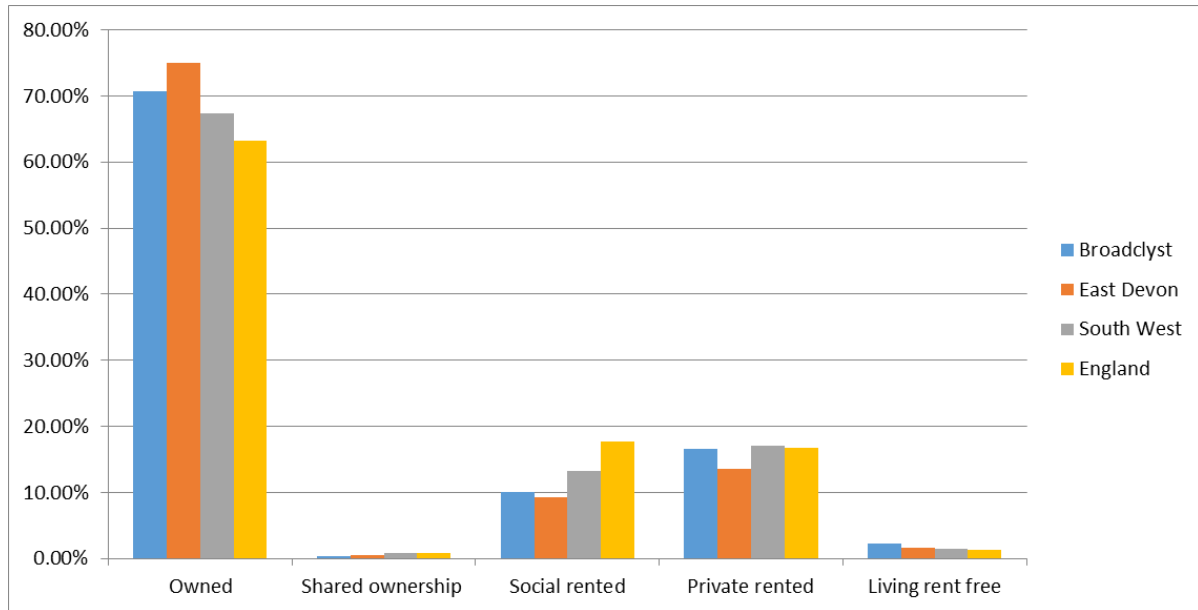
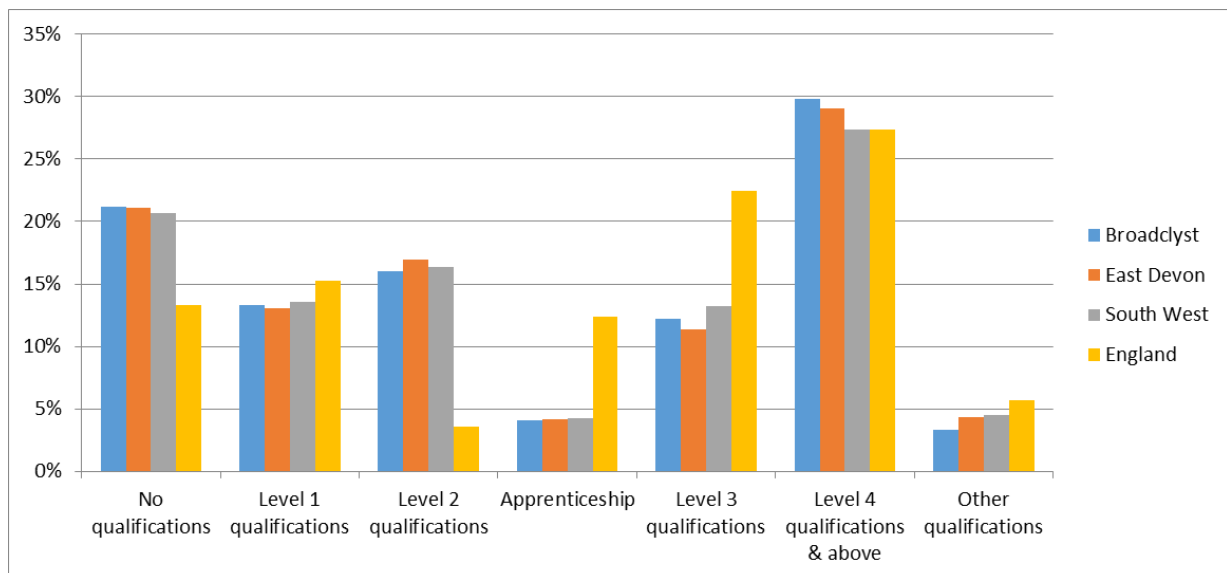


Figure A.8 shows that trends for residents' highest level of qualification in Broadclyst are broadly aligned with district level and regional trends. 21.19% of residents in Broadclyst do not have any qualifications, marginally higher than regional figures (20.70%), but considerably higher than national figures (13.29%). Strikingly, there is a large proportion of residents in the plan area who are highly qualified (Level 4 or above).

Figure A.8: Highest Level of qualification



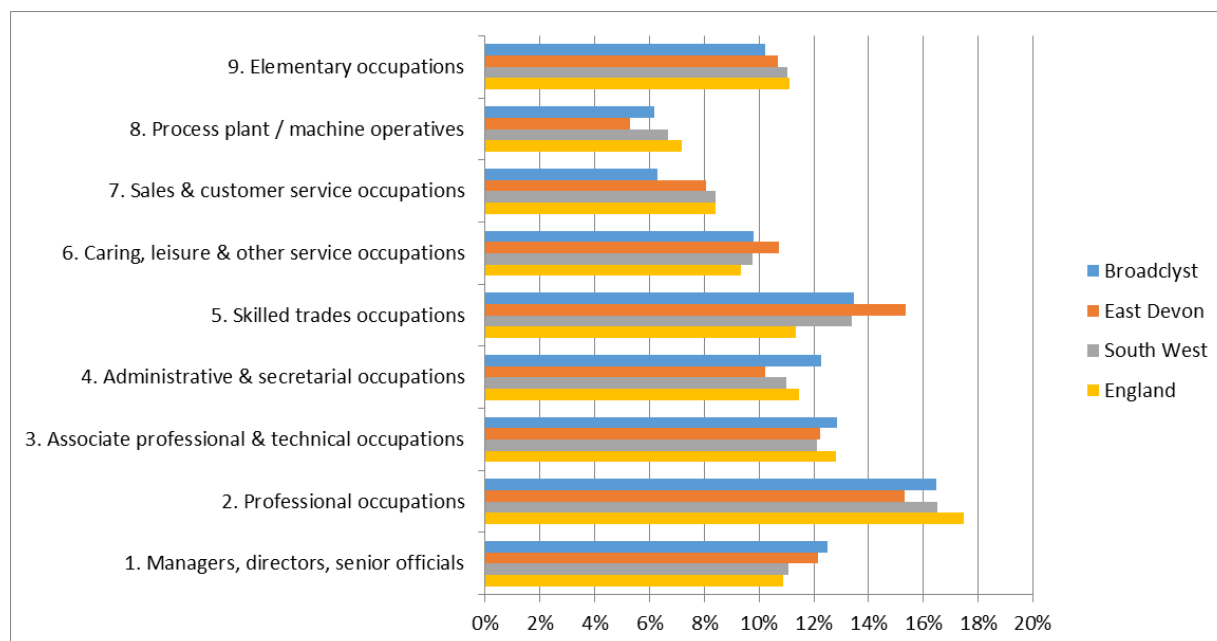
Regarding employment within the Neighbourhood Plan area, the following occupational bands describe 55.28% of the population, in order of highest proportion of the overall workforce:

- Professional occupations
- Skilled trades occupations
- Managers, directors and senior officials

- Associate professional & technical occupations

Notably, the proportion of managers, directors and senior officials within the plan area (12.51%) is greater than comparative figures for the district (12.15%), region (11.06%) and country as a whole (10.87%).

Figure A.9: Occupations of working residents



Residents in Broadclyst Parish have access to many community clubs, groups and associations, including gardening, bowls and theatre⁹⁶. Killerton Gardens offers a large parkland area for outdoor recreation and leisure activities. Additionally, the East Devon Open Space Study Review (2014)⁹⁷ lists 14 public open spaces within the plan area, comprising of outdoor sport pitches, play spaces, allotments, churchyards and amenity spaces.

The service offer is generally good within Broadclyst. The Neighbourhood Plan area is served by two grocery shops, one college, playgroup and primary school, multiple eateries, a doctors surgery, and a large sports centre. However, services are not evenly distributed across the parish, mostly being condensed to the village centre.

Future Baseline

As the population continues to age, this has the potential to place pressures on the existing services and facilities within the timeframe of the Neighbourhood Plan. This could negatively impact on the future vitality of the local community and economy. It is noted, however that the rate of population growth is currently slow and unlikely to place large demand on services in the near future.

The suitability (e.g. size and design) and affordability of housing for local identified needs depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider

⁹⁶ Broadclyst Parish Council (n.d.) 'Clubs and Societies' [online] available from: <https://www.broadclyst.org/community/clubs-and-societies> [accessed 03/05/20].

⁹⁷ East Devon Council (2014): 'East Devon Open Space Study' [online] available from: <https://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/env029-eastdevonopenspacestudy.pdf> [accessed 26/03/20].

implications in terms of transport and access to infrastructure, or the natural environment.

Overall levels of deprivation in the Neighbourhood Plan area are likely to remain low.

A.8 Health and wellbeing

Policy context

National

Key messages from the National Planning Policy Framework⁹⁸ (NPPF) include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- *'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

The policies contained in Chapter 3 'Connecting people with the environment to improve health and wellbeing' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment'⁹⁹ (2018) directly relates to the health and wellbeing SEA theme.

Other key national messages in relation to health include; Fair Society, Healthy Lives¹⁰⁰ ('The Marmot Review', 2011) which investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a

⁹⁸ 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 28/03/20]

⁹⁹ 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 28/03/20]

¹⁰⁰ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://webarchive.nationalarchives.gov.uk/20170106161952/http://www.apho.org.uk/resource/item.aspx?RID=106106> [accessed 28/05/20]

supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is *'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'*.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012¹⁰¹ 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.

Local

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.

The Devon Joint Health and Wellbeing Strategy (JSNA)¹⁰² outlines the following four priorities for Devon between the period of 2020-2015:

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

Summary of baseline

Current Baseline

As shown in **figure A.10**, the proportion of residents who report 'good health' or 'very good health' (82.65%) is higher than comparative figures for the district (79.81%), region (81.42%) and the England as a whole (81.40%). Further, the proportion of residents who report 'bad health' (1.15%) is in line with figures for East Devon (1.13%), the South West (1.14%) and England (1.20%).

¹⁰¹ Health and Social Care Act 2012: <http://www.legislation.gov.uk/ukpga/2012/7/contents/enacted>

¹⁰² Devon County Council (2018): 'Devon Joint Health and Wellbeing Strategy 2018' [online] available from: <https://www.devonhealthandwellbeing.org.uk/strategies/> [accessed 26/03/20].

Figure A.10: General Health

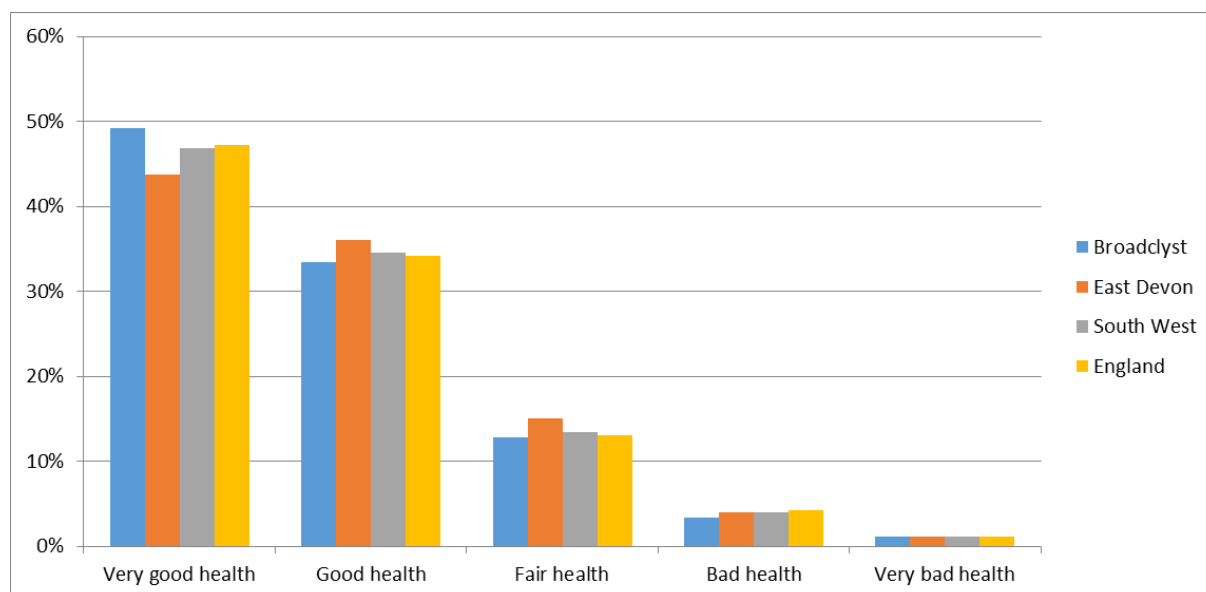
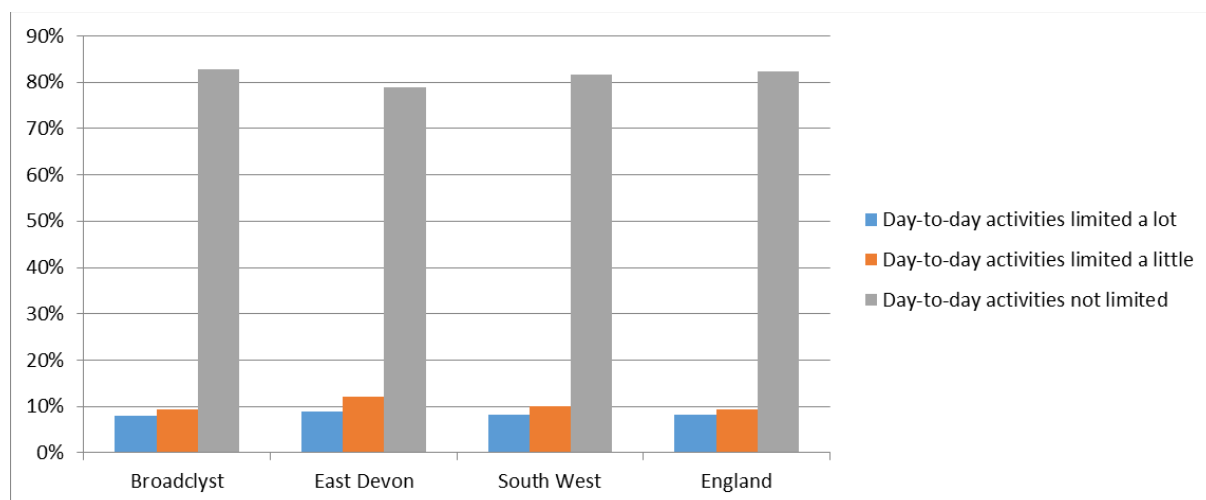


Figure A.11 shows that the proportion of residents with long term health conditions who report that their day-to-day activities are not limited by a long term health condition (82.75%) is higher than figures for East Devon (78.99%), the South West (81.59%) and broadly in line with England as a whole (82.40%).

Figure A.11: Long Term Health Category



The Devon Joint Strategic Needs Assessment (JSNA)¹⁰³ 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 as follows:

- 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.

¹⁰³ Devon County Council (2018): 'Joint Strategic Needs Assessment' [online] available from: <https://www.devonhealthandwellbeing.org.uk/jsna/about/> [accessed 26/03/20].

- 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.

Future Baseline

An ageing population within the Neighbourhood Plan area might place future pressures on health services in the area.

Markers of deprivation, including child poverty, drug networks and domestic abuse present amongst Devon residents increasing and this trend is likely to continue in the absence of focused efforts (wider than the scope of the plan).

Broadclyst hosts an ageing population, which may increase pressures on existing health facilities and specialist medical care.

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 Framework¹⁰⁴ (NPPF) include:

- *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
 - *The potential impacts of development on transport networks can be addressed*
 - *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised*
 - *Opportunities to promote walking, cycling and public transport use are identified and pursued*
 - *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account*

¹⁰⁴ 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 12/04/20].

- *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 taken into account 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 2008.¹⁰⁵ The Devon and Torbay third Local Transport Plan 2011- 2026 (LTP3)¹⁰⁶ outlines the transport strategy for the county. Under the Devon and Torbay LTP3, Broadclyst is designated as a 'Market Town'. The five transport priorities for Market & Coastal Towns and Rural Areas listed within the LTP3 are as follows:

- Assist in supporting existing and future development of the towns;
- Work with the community to demonstrate a low carbon approach to travel;
- Improve accessibility by developing a core bus and rail service supported by community transport;
- Make Devon 'the place to be naturally active' through investment in the leisure network; and
- Develop an approach to parking policy which supports the vitality of town centres.

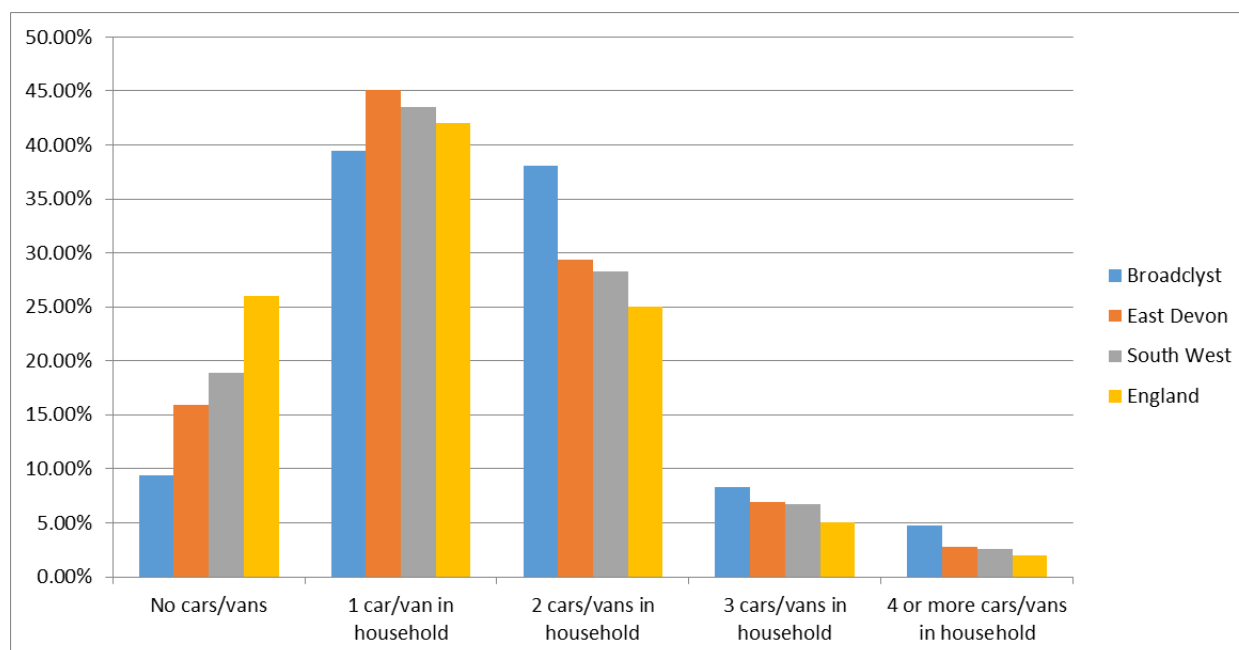
¹⁰⁵ Local Transport Act 2008 [online] available at: <http://www.legislation.gov.uk/ukpga/2008/26/contents> [accessed 13/04/20].

¹⁰⁶ Devon County Council (2911): 'Devon and Torbay Local Transport Plan 3' [online] available from: <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/> [accessed 17/04/20].

Summary of baseline

Current Baseline

Figure A.12: Car ownership



National census data presented in **Figure A.12** indicates that car ownership is high in Broadclyst. The large majority of residents own between one and two cars/vans (77.49%), higher than district level (74.43%), regional (71.84%) and national (67%) figures. Very few residents own no cars or vans (9.38%). This may reflect the village's rural location and the need to travel to higher tier service centres to meet many needs that cannot be met within the village.

The M5, which is a key strategic route from Devon, and links the county with Taunton, Bristol, the Midlands and the North, and the A30 and A38 to the south west, passes through the western part of the Neighbourhood Plan area. However, access from Broadclyst to and from the M5 is only achievable at Junction 29 of the M5 east of Exeter, or Junction 28 at Cullompton.

A key route in the parish is the B3181, which links Broadclyst village with Pinhoe / Exeter to the south west, and Budlake and Cullompton to the north. Station Road links the village to Cranbrook, Clyst Honiton and the A30 to the south. Many parts of the parish are however only accessible by low capacity rural lanes and have poorer access to public transport services.¹⁰⁷

In relation to public transport infrastructure¹⁰⁸, Stagecoach (South West) operates the Exeter- Tiverton service that runs through three main stops through the Neighbourhood Plan area at a regular hourly rate, 7 days per week. The 863 service, operated by Dartline coaches runs from Honiton to Exeter, once per week (Wednesdays) every 10-15 minutes.

¹⁰⁷LUC (2012): 'East Devon Local Plan' [online] available from: <https://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.9-general-evidence/gen001-publicationdraftsustainabilityappraisalreport2012.pdf> [accessed 27/03/20].

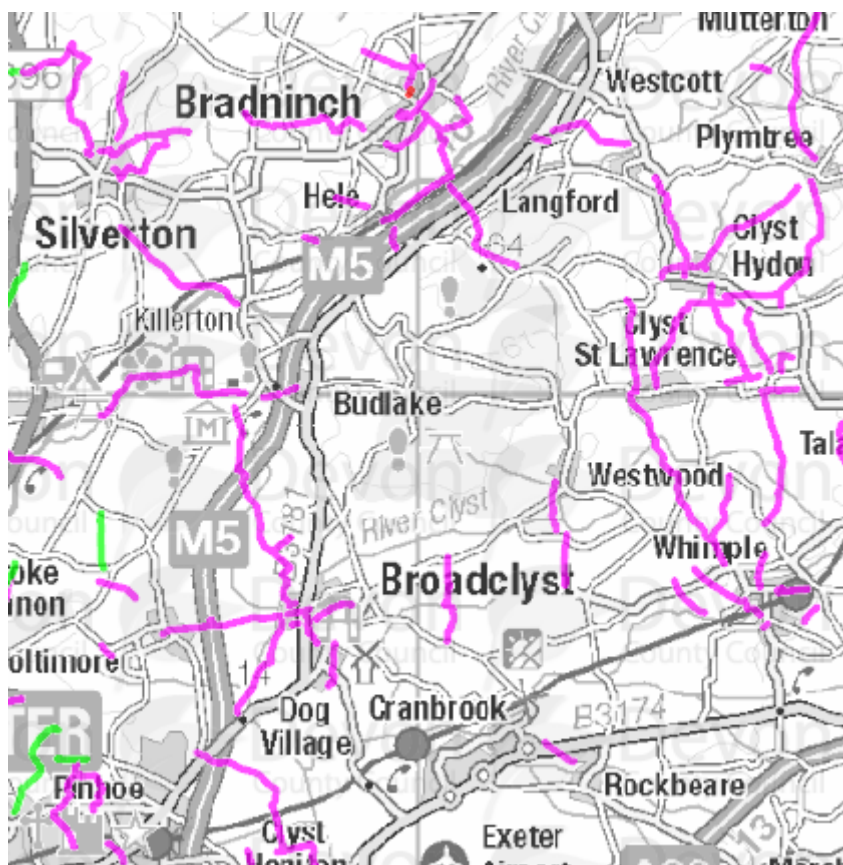
¹⁰⁸ Devon County Council (n.d.): 'Interactive Bus Map' [online] available from: <https://www.traveldevon.info/bus/interactive-bus-map/> [accessed 01/04/20].

Cranbrook Station is located to the south east of the Plan area (2.8 miles via car). South Western Railway services run between London Waterloo and Exeter St Davids. However, access via narrow country roads presents considerable safety hazards for those travelling by foot and/or bicycle, given the lack of formal pavement and cycle routes available from Broadclyst parish.

Exeter Airport is located on the A30 dual carriageway close to Junction 29 of the M5. Stagecoach offers a regular bus service from the Exeter City Centre and train station (service 56)¹⁰⁹. No direct service is currently available from Cranbrook station, despite being the closest station to the airport. As noted in the Local Plan, access roads to the airport for cyclists and walkers are of poor quality.

As shown in **Figure A.13** below, Public Rights of Ways (PROWs) within the plan area are notably relatively sparse in some parts of the parish. However, the new 13 km multi-use Clyst Valley Trail¹¹⁰ will enable people to travel on foot, bicycle, mobility scooter and where possible, on horseback through the valley, linking to the Exe Estuary Trail and the Exe Valley Way.

Figure A.13: PROWs within the approximate plan area (shown in pink)¹¹¹



¹⁰⁹ Exeter Airport (n.d.): 'To & From the Airport' [online] available to download from: <https://www.exeter-airport.co.uk/to-and-from-the-airport/> [accessed 27/04/20].

¹¹⁰ Great Trees in the Clyst Valley (2019): 'Clyst Valley Regional Park' [online] available from: <https://www.clystgreattrees.org.uk/about/> [accessed 07/04/20].

¹¹¹ Devon County Council (n.d.): Devon Environment Viewer [online] available from: <http://map.devon.gov.uk/DCCViewer/> [accessed 14/04/20].

Figure A.14: Method of travel

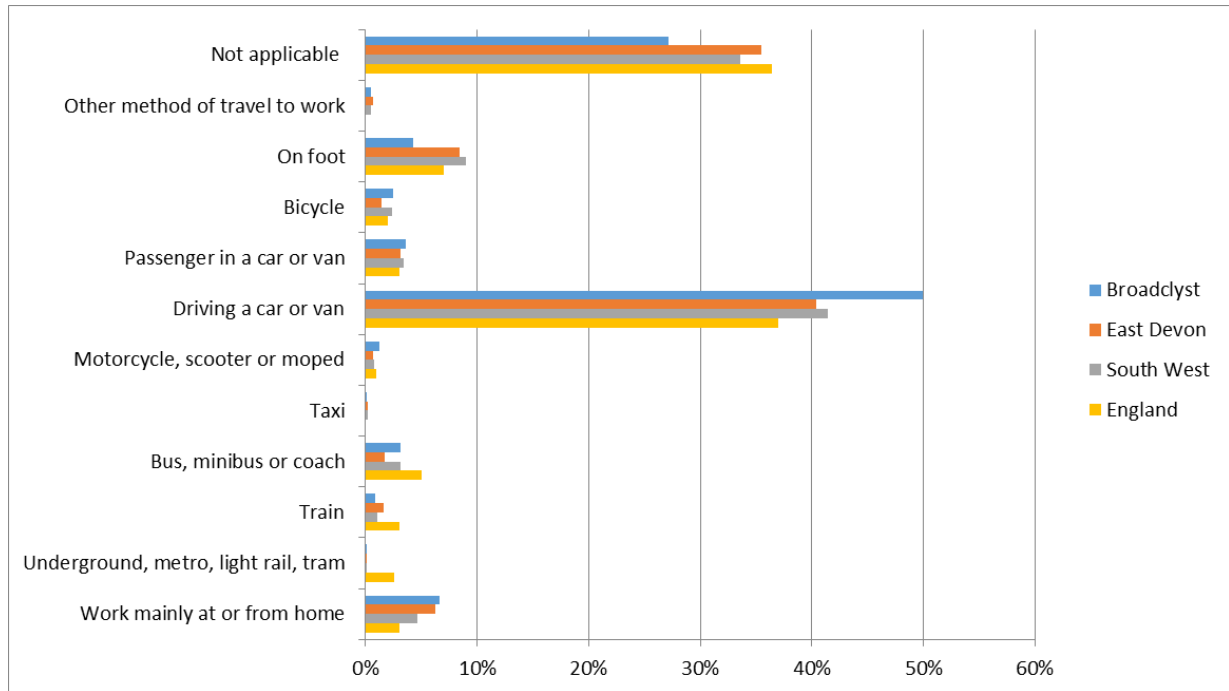


Figure A.14 indicates that the most common mode of transport for residents within the plan area is driving a car or van (49.93%). This is in line with general trends for the district, region and nation as a whole. However, car or van use is particularly dominant in Broadclyst. Further, public transport use in the Plan area is low (4.25%), which is in line with trends for East Devon (3.58%) and the South West (4.39%), but not for England as a whole (10.60%).

Future Baseline

Growth in the parish and in the surrounding part of East Devon has the potential to place increased pressures on the local road network in the Neighbourhood Plan area.

Increased development within the Plan area offers the potential to deliver sustainable transport network enhancements, including improved pedestrian and cycle networks. There could also be opportunities to link new development with the Clyst Valley Trail network

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