

BEER NEIGHBOURHOOD PLAN

**SUSTAINABILITY APPRAISAL/
STRATEGIC ENVIRONMENTAL ASSESSMENT**

ENVIRONMENTAL REPORT

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1. INTRODUCTION

- 1.1 BPP Consulting LLP has been appointed by Beer Parish Council to undertake a Strategic Environmental Assessment of the draft Beer Neighbourhood Plan ('the NP').
- 1.2 Strategic Environmental Assessment (SEA) is a systematic process for evaluating, at the earliest appropriate stage, the environmental effects of a plan before it is made.
- 1.3 Planning Practice Guidance¹ (PPG) advises that

Where a [neighbourhood plan](#) is likely to have a significant effect on the environment a strategic environmental assessment must be carried out and an environmental report prepared in accordance with [paragraphs \(2\) and \(3\) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004](#).

Whether a neighbourhood plan proposal requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed. A strategic environmental assessment may be required, for example, where:

- *a neighbourhood plan allocates sites for development*
- *the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan*
- *the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the [Local Plan](#).*

- 1.4 East Devon District Council (EDDC) previously screened out the need for a full SEA on the draft Beer Neighbourhood Plan as it was considered unlikely to have a negative effect on the environment. However, due to the allocation of a site for 31 dwellings ('Site 2', land at Short Furlong – 'proposed Site Allocation'), EDDC has advised in its most recent screening opinion (January 2017) that:

'taking into account the scale and nature of proposals in the Plan, with particular consideration of the allocated site, an SEA should be undertaken 'to ensure that environmental impact is considered and satisfactorily mitigated'.

¹ Planning Practice Guidance <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> Paragraph 046 Reference ID: 11-046-20150209

2. BEER NEIGHBOURHOOD PLAN

- 2.1 The Neighbourhood Plan is intended to cover the period 2014-2031. It covers the area illustrated in Figure 1. Its planning policies are designed to provide a framework which will be used, alongside national, county and district planning policies, by local authority development management officers and Councillors (elected Members) when considering planning applications for development.
- 2.2 The East Devon Local Plan was adopted in January 2016. The Local Plan includes planning policies covering the period 2013-2031. Planning policy *Strategy 27 - Development at the small Towns and Larger Villages* does not allocate land for development within Beer. It does provide for communities to promote development, other than that which is supported through the Local Plan, through preparation of a Neighbourhood Plan or promotion of community-led development, justifying how and why the development will promote the objectives of sustainable development. It identifies Beer as one of the larger villages '*offering a range of accessible services and facilities to meet many of the everyday needs of local residents and having reasonable public transport.*'
- 2.3 The draft Beer NP identifies the need for additional housing but that there are few opportunities in Beer for development within the Built-Up Area Boundaries (BUAB), and these are restricted mainly to one or two-unit infill plots, certainly fewer than five-unit affordable threshold. The NP considers that the only prospect for a significant development delivering a meaningful number of affordable homes is to build outside of the BUAB.
- 2.4 The need to allocate a site to provide additional housing, including a proportion of affordable housing, was recognised part way through the production of the NP. East Devon DC advised that a site allocation consulted on and included in the Neighbourhood Plan was the preferred way forward and so public consultation was undertaken in the summer of 2016, to specifically identify a preferred site for additional housing. Four sites were put forward and consulted on (Figure 2).

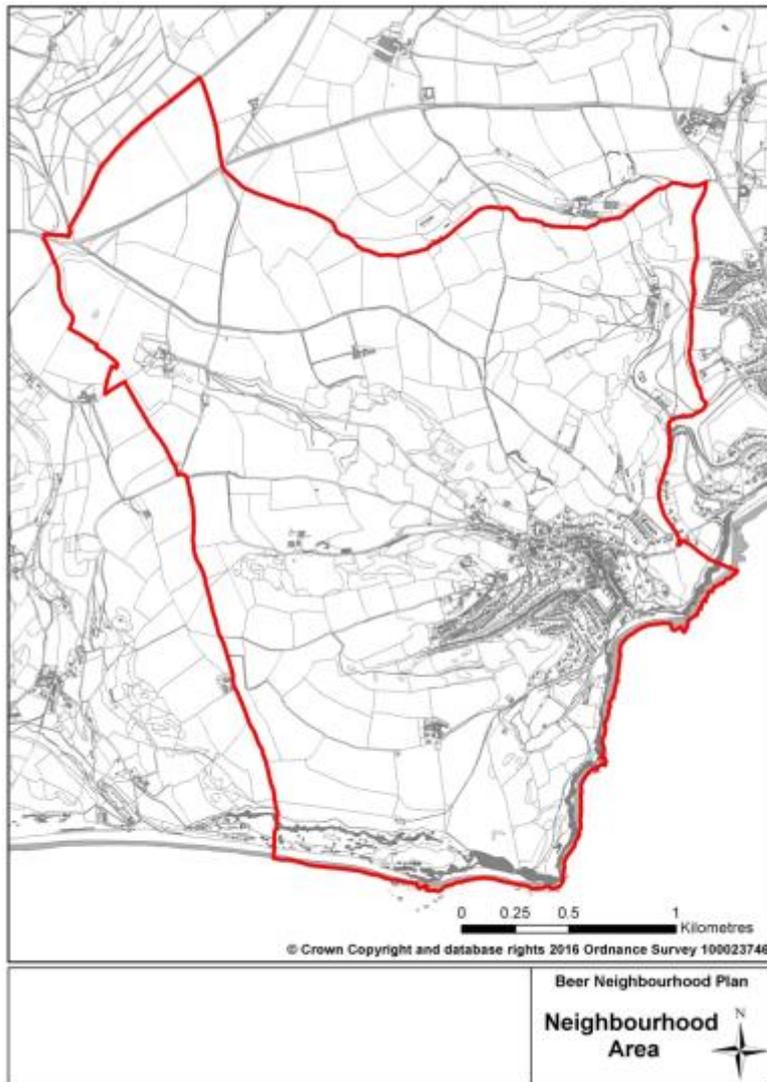


Figure 1. Beer NP Area

- 2.5 Following consultation, Site 2 *Extension of Short Furlong*, was selected for allocation in the NP and included within Policy H3 (reproduced below):

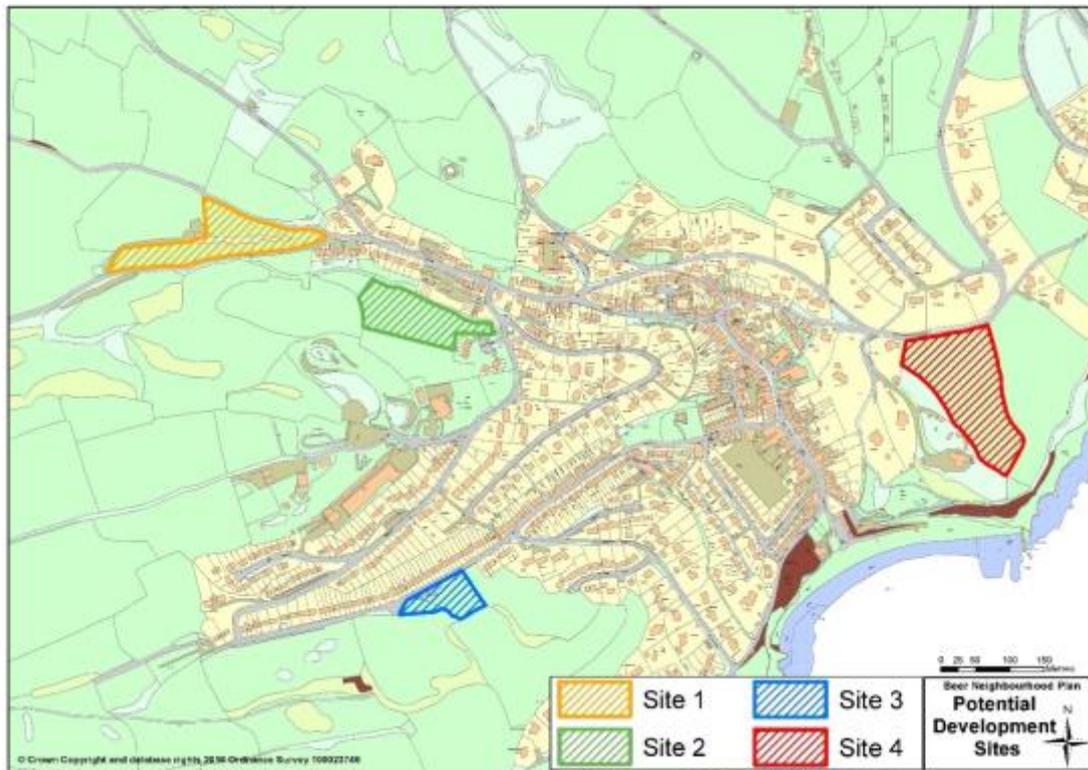


Figure 2. Potential Development Sites subject to NP consultation (June 2016)

Policy H3 – Site allocation

The land at Short Furling identified in figure 11 is allocated for up to 31 dwellings; a minimum of 43% affordable houses will be needed to be provided on-site as part of the development. Proposals should be informed by detailed landscape assessment (noting the sensitivity of the site and Beer in general) and demonstrate that they will minimise potential adverse impacts upon the landscape character of the area and skyline.

Proposals must provide for adequate drainage and provide safe and satisfactory access arrangements. High quality design reflecting local building styles and materials will be required and existing vegetation surrounding the site should be retained with new tree and hedgerow planting incorporated into any scheme, to encourage biodiversity and reduce harm to the Area of Outstanding Natural Beauty.

3. STRATEGIC ENVIRONMENTAL ASSESSMENT AND SUSTAINABILITY APPRAISAL METHODOLOGY & PROCESS

3.1 Strategic Environmental Assessment (SEA) is a statutory assessment process, required under the SEA Regulations (Statutory Instrument 2004, No 1633). The Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment, and set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)⁵. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'*.

3.2 The key stages of SEA are as follows:

A. Screening

This stage is complete: East Devon District Council issued its opinion in January 2017 that due to the allocation of the Short Furlong site, 'the Beer Neighbourhood Plan is likely to have a significant environmental impact beyond that has previously been identified through the SEA of the Local Plan. Beer is located in a sensitive area in the district, and taking into account the scale and nature of proposals in the plan, with particular consideration of the allocated site, an SEA should be undertaken to ensure that environmental impact is considered and satisfactorily mitigated.'

B. Scoping

A Scoping Report was produced in April 2017. This set out the context, objectives and approach to the assessment. It established the baseline, and identified the policies, plans and programmes relevant to the NP, and drew out the key environmental issues and objectives. It also described reasonable alternatives that will be assessed. The 'consultation bodies' (Natural England, Historic England and the Environment Agency) were consulted on the Scoping Report, and any comments were taken on board in producing the Environmental Report.

C. Developing and Refining Alternatives and Assessing Effects

Assessing the NP and its policies against SEA objectives, including reasonable alternatives to the NP (as described in the Scoping Report).

D. Production of Environmental Report

This Report describes the process undertaken carrying out the assessment setting out findings and highlighting any the likely significant effects on the

environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. Where possible these effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects, and measures to prevent, reduce or offset these as fully as possible.

This includes commentary on the results of the assessment process.

E. Consultation on Environmental report

This will be undertaken by Beer PC.

F. Monitoring

To be undertaken in future – a series of indicators are recommended.

Sustainability Appraisal and SEA

3.3 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. Planning Practice Guidance on sustainability appraisal² explains that the purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

3.4 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in Paragraph 165 of the National Planning Policy Framework (NPPF). It is designed to ensure that the Development Plan Document (DPD) preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process appraises the likely social, environmental and economic effects of the strategies and policies within a DPD (in this case the East Devon Local Plan) from the outset of its development.

3.5 Planning Practice Guidance recommends that SA incorporates the requirements for Strategic Environmental Assessment (SEA) set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which implements the requirements of the EU SEA Directive³. However, it also states that *'Strategic environmental assessment alone can be required in some limited situations where sustainability appraisal is not needed. This is usually*

² Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

³ EU Directive 2001/42/EC

only where either [neighbourhood plans](#) or [supplementary planning documents](#) could have significant environmental effects.'

- 3.6 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses only on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts.
- 3.7 This integrated approach was applied to the SA of the East Devon Local Plan. The EDLP SA objectives were devised and agreed through a comprehensive process including extensive consultation, and applied to the various stages of the LP.
- 3.8 The Scoping Report set out the methodology to be used in the SEA, explaining that the SA objectives used in the SA of the EDLP would be used to appraise the NP - in the appraisal of the potential effects of the proposed Site Allocation, the Neighbourhood Plan as a whole, and of reasonable alternatives. In doing so this means that the SEA is effectively a Sustainability Appraisal. This reflects good practice and the need (set out in the SEA Regulations) to consider *'The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors.'*
- 3.9 *Therefore, throughout the rest of this report the abbreviation 'SA' should therefore be taken to refer to both SA and SEA.*

Stage B - Scoping

- 3.10 The Scoping Report was produced in April 2017 and the consultation bodies were consulted. The scoping report sets out:
- **Policies, plans and programmes (PPP)** that are relevant to the NP were identified and relationships understood enabling potential synergies to be exploited and any inconsistencies and constraints addressed;
 - **Baseline** information on the following SEA topics where available: Biodiversity, fauna and flora; Population and human health; Water; Soil; Air; Climate Factors; Material Assets; Cultural Heritage and Landscape. In addition, information on Social and Economic factors has been taken in to consideration. This baseline provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them.

- Drawing on the PPP review and Baseline the **Key Environmental Problems and Issues** (including environmental problems as required by the SEA Directive).
- The **Appraisal Framework** sets out the SEA Objectives which have developed from the key issues. Where appropriate, targets along with indicators are used to enable these objectives to be measured.

3.11 The advice in Planning Practice Guidance⁴, that SEA of Neighbourhood Plans should be proportionate, reflecting the content and detail of the NP, was taken into account in defining the scope:

The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the [neighbourhood plan](#) proposal. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan.

3.12 The *Practical Guide to SEA*⁵ advises that if issues have been dealt with in other plans or programmes they need not be addressed further in the plan that is being developed, but potential tensions or inconsistencies need to be considered.

3.13 The Screening Opinion identifies a potentially significant effect of allocation of a site (Short Furlong) for 30 dwellings given the Site's location in an Area of Outstanding Natural Beauty (AONB). It also identifies that the site is approximately 700m from the Beer Quarry and Caves Site of Special Scientific Interest (SSSI) Special Area of Conservation (SAC), designated for their bat colonies which may be sensitive to disturbance and where development may affect foraging habitat.

3.14 This indicates that impact on landscape and nature conservation are key issues to consider in an SEA. A Habitats Regulations Assessment is being undertaken separately to assess potential effects of development at the proposed Site Allocation on the Beer Quarry Caves Special Area of Conservation (SAC) and this will need to be taken into account when considering the SEA and its conclusions.

3.15 Much of the information in the Scoping Report was drawn from:

- the NP and the evidence underpinning it,

⁴ Paragraph 030 Reference ID: 11-030-20150209

⁵ ODPM etc (2005) Para 5.A.4 & 5.A.10

- the Local Plan,
 - the Sustainability Appraisal of the Local Plan⁶⁷, and
 - data from ONS⁸.
- 3.16 In order to be proportionate, this has not been extensively reproduced, but reference has been made to this to identify the key environmental issues relevant to the Beer NP and the SA, and to inform the SA framework and objectives.
- 3.17 In terms of planning policy, the NP has been prepared within the context of the development plan for East Devon, principally the adopted Local Plan, and national planning policy in the form of the National Planning Policy Framework (NPPF). The NPPF sets out what sustainable development means for the planning system in England. As such it reflects and translates requirements of EU and national legislation. The SA of the Local Plan included consideration of relevant plans, policies and programmes. The Local Plan, which was written to conform with the NPPF and apply it at local level, was found sound at Examination and duly adopted in January 2016.
- 3.18 Given the geographic area that the NP covers, and the likely limited scope of potentially negative environmental effects through the allocation of one site, the East Devon Local Plan and AONB Management Plan are considered to be the most relevant to the NP. The East Devon Villages Plan is currently subject to consultation and so has limited weight, but once adopted will be relevant as it contains a policy for the development of the village centre.
- 3.19 Fuller consideration of potentially relevant plans, projects or programmes is contained in the Scoping Report Annex 1.
- 3.20 The EDLP SA objectives, used in the SA of the Neighbourhood Plan, are reproduced in Table 1 below:

⁶ East Devon District Council (2008) SA Generic Scoping Report for Core Strategy and other LDF documents

⁷ Land Use Consultants (2012) Sustainability Appraisal Report. East Devon LP Publication Draft and (2013) Sustainability Appraisal Addendum. East Devon LP Submission Version.

⁸ <http://www.neighbourhood.statistics.gov.uk/>

Table 1. EDLP SA Objectives to be used in SA of Neighbourhood Plan

| EDLP SA Objective |
|--|
| 1. To ensure everybody has the opportunity to live in a decent home |
| 2. To ensure that all groups of the population have access to community services. |
| 3. To provide for education, skills and lifelong learning to: i. meet the needs of the local population, and ii. meet local employment needs |
| 4. To improve the population's health |
| 5. To reduce crime and fear of crime |
| 6. To reduce noise levels and minimise exposure of people to unacceptable noise pollution |
| 7. To maintain and improve cultural, social and leisure provision |
| 8. To maintain and enhance built and historic assets |
| 9. To promote the conservation and wise use of land and protect and enhance the landscape character of Devon |
| 10. To maintain the local amenity, quality and character of the local environment |
| 11. To conserve and enhance the biodiversity of East Devon |
| 12. To promote and encourage non-car based modes of transport and reduce journey lengths |
| 13. To maintain and enhance the environment in terms of air, soil and water quality |
| 14. To contribute to a reduction in local emissions of greenhouse gases |
| 15. To ensure there is no increase in the risk of flooding |
| 16. To ensure energy consumption is as efficient as possible |
| 17. To promote wise use of waste resources whilst reducing waste production and disposal |
| 18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce |
| 19. To maintain and enhance the vitality and viability of the Towns of East Devon |
| 20. To encourage and accommodate both indigenous and inward investment |

- 3.21 The SA uses matrices in which the potential effects of development on the proposed Site Allocation, and the potential alternative sites, are assessed against each of the objectives.
- 3.22 However, given the more general nature of the policies of the NP (apart from the site-specific Policy H3) to be 'proportionate' and to focus on key issues identified in the Scoping (and reproduced in section 4 of this report) the SA of the Plan as a whole has been undertaken against broad SA 'themes'.
- 3.23 These themes reflect the SA objectives, and also reflect the key issues identified above and the issues that the SEA Directive requires that the likely significant effects of a plan are assessed against (Table 2).

Table 2. Themes used in SA of NP Plan as a whole:

| Theme | SA Objectives |
|---|--|
| Communities, Population, Housing and Health | 1. Housing 2. Communities 4. Health 5. Crime 7. Cultural, social & leisure provision |
| Economy, skills and employment | 3. Education & Skills 18. Employment 19. Vitality and viability of towns 20. Encourage investment |
| Amenity | 6 Noise 10. Amenity/local environment |
| Transport & Movement | 12. Sustainable transport |
| Energy, Climate & Resources | 14. Greenhouse gas emissions 16. Energy & consumption 17. Waste reduction |
| Air, soil and water | 13. Air, soil & water 15. Flood risk |
| Historic & cultural heritage | 8. Historic assets |
| Landscape, townscape & natural environment | 9. Landscape character 11. Biodiversity |

3.24 The appraisal involves giving scores on the effect and/or contribution to each SA objective that the Site Allocation and the NP as a whole would make, along with a brief commentary explaining the score. The scoring will reflect the common convention as applied in the Local Plan SA (Table 3):

Table 3. Key to SA scoring

| | |
|-----|----------------------|
| ++ | Significant positive |
| + | Minor positive |
| 0 | Negligible |
| - | Minor negative |
| -- | Significant negative |
| ? | Uncertain |
| +/- | Mixed |

3.25 The SA depends on professional judgement informed by evidence, including that included in the SA of the Local Plan, the Screening Opinion, and for the Site Allocation the evidence provided in support of the planning application 14/2621/MOUT. However, it is important to acknowledge that the SA is not a site-specific EIA and does not include the level of detail required of an EIA.

- 3.26 Reference has also been made to the ‘*Assumptions used in Appraisal of Site Allocations*’ included as Appendix 5 to the SA of the East Devon Local Plan. The assumptions relating to residential sites are useful only as a general guide to undertaking the appraisal at NP scale, and some are overly simplistic. Therefore, additional judgement has been used to take into account the context of the NP (the geographic scale, specific issues, options for development) and the characteristics and factors specific to each site (Site Allocation and alternatives) appraised.
- 3.27 The appraisal also includes consideration, where possible and relevant, of the nature of potential environmental effects: *Direct/indirect nature of effects; Scale; Probability of occurring; Duration; Frequency; Reversibility; Cumulative impact.*
- 3.28 Recommendations for mitigation of potentially adverse environmental effects are set out where possible, as well as potential indicators to be used in monitoring.

Stage C Developing and Refining Alternatives and Assessing Effects

- 3.29 Regulation 12 (2) of the SEA Regulations requires that: ‘*The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of— (a) implementing the plan or programme; and (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.*’
- 3.30 As set out in the Scoping Report, the SA includes an appraisal of the potential effects of development at the proposed Site Allocation at Short Furlong (Policy H3) and of the NP policies as a whole including Policy H3.
- 3.31 Reasonable alternatives to these that are appraised are:

Table 4. Reasonable Alternatives

| Neighbourhood Plan | Reasonable Alternative |
|--|---|
| Proposed Site Allocation (Short Furlong) | The other three potential sites identified and subject to consultation |
| Neighbourhood Plan Policies | Absence of NP policies (including Site Allocation), and so development occurring in accordance with the Local Plan and NPPF |

4. BASELINE AND CHARACTERISTICS OF BEER NP AREA

- 4.1 The SA of the Local Plan includes detailed information for the District as a whole, drawn from a range of sources. Less comprehensive information is available at Parish level, although local evidence on the Parish supports the Beer NP.

Area

- 4.2 Beer Parish covers just over 700,000 hectares, of which 90% is greenspace⁹. Beer village is the main settlement with the centre lying within a valley near the coast and housing extending up the valley sides. Agriculture is the main land use around the settlement with permanent pastures surrounded by hedges, and some arable fields. The agricultural land quality is 3 'good to Moderate'¹⁰.

Population & Housing¹¹¹²

- 4.3 Beer has a population of around 1,300 people and 750 dwellings, although 20% of these are second or holiday homes. The household count is 591, 70% of which are households of 2 or fewer people, the same as for the rest of Devon but higher than for England. 71% of households are homeowners. However, house prices are high in East Devon as a whole, at 11.5 times average income. The population has remained fairly stable but is swelled by tourists in the summer.
- 4.4 The population is relatively old - of the 1,150 residents over 16, 55% are over the age of 55, with 13% over 75 – a similar pattern to the rest of Devon, but higher than the average for England. 66% of the population are economically active, with 24% retired (again a higher proportion than England as a whole). However, the population is relatively healthy with 78% being in good or very good health, and is relatively well educated with 26% having a level 4 qualification or above, both higher than for the rest of England.
- 4.5 Local services in the village include a post office, meeting hall, church, GP, primary school and public house, and a number of sports clubs.

⁹ ONS Neighbourhood Statistics <http://www.neighbourhood.statistics.gov.uk/>

¹⁰ Natural England Agricultural Land Classification Map South West Region (ALC006) <http://publications.naturalengland.org.uk/publication/144017?category=5954148537204736>

¹¹ ONS Neighbourhood Statistics <http://www.neighbourhood.statistics.gov.uk/>

¹² Parish of Beer Local Housing Needs Report (2013) gives slightly different figures to ONS and 2011 census

Transport

- 4.6 The main A3052 between Exeter and Lyme Regis runs through the north of the parish with smaller roads servicing Beer and further small country lanes and green lanes. 84% of the households have at least 1 car. There is a limited bus service to Seaton and Sidmouth. There is no proximate rail service (the nearest being Axminster).

Economy

- 4.7 The village has a history of quarrying, fishing, agriculture and lace manufacture. Tourism is now the main economic activity and the high number of homes rented to short-term visitors is one of the reasons the village maintains a good range of shops and services. Services and facilities in the village include a community hall, post office, pubs and restaurants, church, primary school, and GP, as well as formal and informal greenspace although activities for young people are limited.

Landscape

- 4.8 The rural landscape is made up of chalk grassland, agricultural fields and copses. Much of the agricultural land is owned by Clinton Devon Estates. Beer is set in part of the East Devon Area of Outstanding Natural Beauty (AONB) which washes over much of the western part of the settlement. The AONB is characterised by intimate wooded combes, vast areas of heathland, fertile river valleys and breathtaking coastal and hilltop views. It includes the East Devon section of the Jurassic Coast - England's first natural World Heritage Site (including the areas to the immediate east, west and south of the settlement of Beer).
- 4.9 The settlement sits within the 'Open Coastal plateaux' (1B) and (mostly) 'Coastal Slopes and Combes' (4D) Landscape Character Types (LCA)¹³, while the coastal part of the Plan area is covered by 'Coastal Cliffs' and some parts of the north and east are covered by 'Lower farmed and settled slopes'.

Biodiversity

- 4.10 The biodiversity of the parish is summarised in the Biodiversity Audit prepared by Devon County Council¹⁴. There are a number of designated sites in the NP area. The Sidmouth to Beer Coast SSSI extends 12km along the coastline west from Seaton Hole, designated for chalk grassland on the cliffs

¹³ East Devon Landscape Character Assessment

¹⁴ Devon County Council (2010) Beer Parish Biodiversity Audit <http://www.devon.gov.uk/beerpba.pdf>

and its associated flora and fauna, and the valley woodlands. Beer Quarry and Caves SSSI and Special Area of Conservation (SAC) is located to the west of the settlement, designated for its importance as a hibernation site for Bechstein's bat, lesser and greater horseshoe bats. A separate Habitats Regulations Assessment (HRA) has been undertaken to specifically assess whether Policy H3 and development on the Site Allocation could result in an adverse effect on the integrity of European Sites (the SAC) and to identify measures to avoid or mitigate any adverse effects.

4.11 There are also a number of County Wildlife Sites in the parish:

- Beer Quarry and Caves County Wildlife Site
- Beer Head County Wildlife Site
- Beer Fields County Wildlife Site
- Bovey Lane Fields County Wildlife Site
- Bovey Lane Quarries County Wildlife Site

4.12 There are also two Local Nature Reserves (LNRs) at Seaton Marshes to the east of the settlement and Holyford Woods to the north.

Air quality

4.13 There is no Air Quality Management Area in the parish. East Devon in general has good air quality.

Water and Flooding

4.14 The Environment Agency identifies that the area immediately behind the beach and extending up Fore Street, Causeway, Townsend and Bovey Lane is within Flood zone 2 and 3, and so at relatively medium (1-0.1%) and high (>1%) probability of coastal flooding. There is a Groundwater Protection Zone (Zone 1 and 2) to the north west of the settlement. Bathing water quality at Beer was classified as 'excellent' in the latest annual classification¹⁵.

Heritage

4.15 Beer is a picturesque and historic fishing village. Much of the settlement is covered by a Conservation Area which contains over 20 Grade II listed buildings, most built with local stone and clustered in the village centre on Fore Street and Causeway. A further 2 Grade II and 2 Grade II* listed buildings are located towards the western edge of the NP area at Bovey

¹⁵ <https://environment.data.gov.uk/bwg/profiles/index.html>

House along the Holyhead Road. There is 1 Scheduled Ancient Monument (a mound) right at the western boundary of the NP area at Bovey Fir Cross.

Key Issues

- 4.16 Identification of key issues to be addressed in the SA needs to reflect the baseline information as well as issues identified in other relevant assessments and evidence.
- 4.17 The objectives selected for the SA of the East Devon Local Plan reflect the key issues and trends identified for East Devon as a whole in the SA Scoping Report, and also to encompass the full range (including environmental) of sustainability issues.
- 4.18 The NP itself also identifies the key issues affecting the plan area and sets out objectives and policies to address these.
- 4.19 Key issues are therefore identified as:
- **Population & Health:** Including provision of housing to provide for the resident population given the cost of housing and amount of stock that is tourist accommodation;
 - **Economy and Employment:** Maintaining and developing the tourist industry and encouraging diversification.
 - **Biodiversity:** Protection and enhancement of biodiversity, including of designated sites and protected species including the SSSIs and SACs.
 - **Cultural heritage:** Protection of historic heritage and assets in Beer village, including their setting.
 - **Landscape:** Protection and enhancement of landscape quality and achievement of the objectives of the AONB.
 - **Transport:** Enabling development that has good access to services, the road network and where possible public transport.
- 4.20 The themes used in the SA of the NP as a whole reflect these key issues.

5. SUSTAINABILITY APPRAISAL OF SITE ALLOCATION AND ALTERNATIVES

- 5.1 The detailed appraisal matrices are presented in **Appendix 1** to this report. A summary of the scores given to the Site Allocation (Policy H3) and to the alternatives (3 other sites) is presented in Table 5 below.

Site Allocation (Policy H3)– Short Furlong (Site 2)

- 5.2 The Site Allocation (Policy H3) would be likely to have a number of positive effects, including *significant positive* effects on SA objectives relating to housing and communities. This score was given due to the potential delivery of up to 31 dwellings, of which 13 would be affordable, and the contribution this would make to meeting local housing needs with resultant benefits to the community. In the absence of Policy H3 and a site allocation, delivery of new dwellings would be likely to be difficult with only low numbers provided within the Built Up Area Boundary, that would not address the village's housing needs and would not have the same benefit for the community.
- 5.3 The *significant positive* effect on SA objectives relating to communities and access to community services, and on vitality and viability of the village reflects the site's proximity within easy walking and cycling distance to the village centre and its services, including bus service, encouraging patronage of local services. Through provision of affordable housing for local people who would be resident and active throughout the year, including young families, improving benefits to community cohesiveness and vitality.
- 5.4 *Minor positive* effects were assessed as likely against the SA objectives regarding education, health and employment, as while the site does not offer direct potential for delivery of improved services or jobs, the provision of housing to meet local need, including affordable housing for those with a 'local connection', would have a positive effect on the patronage of local services including the proximate school, with benefits to the economy, employment and education.
- 5.5 The *minor positive* score against the SA objective relating to health reflects improved wellbeing through provision of affordable housing, and proximity of the site to both the village centre and countryside, and potential for green infrastructure on the site. The proximity of the site to the village centre also scores *minor positive* against sustainable travel. The avoidance of areas of flood risk, and the potential to incorporate sustainable drainage on the site, results in a *minor positive* score against the SA objective on flood risk.

- 5.6 *Minor negative* effects were assessed against the SA objective relating to landscape character. The site is within the East Devon AONB, the boundary of which cuts through Beer Village. It lies within the East Devon Landscape Character Type 'Coastal slopes and combes' characterised by the following key characteristics which apply to the site: narrow steep valleys, coastal influence, a mix of unenclosed woodland, small and medium irregular fields, pasture, high, open slopes grading to intimate and enclosed lower valley. The Landscape Character Assessment & Management Guidelines advise that these features, including hedgerows, pastures, woodland and ecological corridors should be retained and enhanced.
- 5.7 The Landscape & Visual Impact Assessment (LVIA) submitted in support of an application for development of the site in 2014 (14/2621/MOUT) illustrates likely views of the development from various viewpoints, indicating that visibility would be relatively limited from short distance viewpoints within the village due to buildings, vegetation and topography, but is more pronounced from long distance viewpoints from the east. It also proposed mitigation measures, primarily tree and hedge planting, consistent with the LCA guidelines. The LVIA concluded that the development could be accommodated at the site without material harm to the character of Beer and its landscape setting, being integrated into the existing townscape, sitting below the woodland on the skyline and being broken up by planting.
- 5.8 The site lies within one of the 'valued prominent skylines' identified in the NDP (Figure 4), although visibility into the site may be restricted by existing vegetation and buildings (to the north and east) and the land falls away steeply northwards. Although in the steep sided valley, the site is on the lower part of the valley which may reduce visibility and visual impact.
- 5.9 The site is also within the Coastal Preservation Area designation in the East Devon Local Plan, but given its size and location between parts of Beer that are already developed would not be likely to significantly harm the undeveloped/open status of the area as a whole, visual connectivity, or views to and from the sea. The Heritage Coast designation washes over the site but it is some distance inland and would not make a significant contribution to preservation of the undeveloped nature of the coast.
- 5.10 While it is outside of the existing Built Up Area Boundary (BUAB) and is within the AONB (as is the western part of Beer village), the site runs parallel to and south of existing development along Townsend (and the BUAB) and would be accessible off Mare Lane and fairly contained. The site occupies the northern, lower part of the field and an area of open space would maintain a

degree of separation and openness between the development and the school to the south.

- 5.11 The site could be considered to be within an area where landscape character is already influenced by development, and where development on the allocated site may have a small and localised impact on the landscape character, the AONB and its natural beauty, and on the setting and character of the village. It would result in loss of meadow, a feature of the Coastal Slopes and Combes LCT, although planting and mitigation including enhancement of the hedgerows would enhance that feature of the LCT and could have wider landscape and biodiversity benefits.
- 5.12 Minimising visual impact, and impact on landscape character, will depend on design and planting/landscaping including to avoid development from the most visible parts of the site, screen the development and ensure that it reflects the AONB Management Plan, and is absorbed into the grain of the landscape and minimises adverse effects on the landscape quality and character of the AONB. Policy H3 requires development to be designed to reduce harm to landscape character and for enhancements to be incorporated, including planting of trees and hedgerows which is considered appropriate to achieve this.
- 5.13 Therefore, the overall effect on the objective would be minor negative, long-term, and permanent, although mitigation may further reduce the visual impact over time as planting matures and the development becomes assimilated into and becomes part of the local landscape and village.
- 5.14 *Minor negative* scores were also assessed against the SA objective relating to amenity/local environment, due to the impact of new development on visual amenity, and temporarily due to noise associated with increased traffic. Similarly, as any development would generate traffic, a minor negative score was assessed against *greenhouse gas emissions*. Development of the site would inevitably result in loss of soils, and while this is indicated to be Grade 3 it is not known whether this is Grade 3a (higher quality). In any event, the area is relatively small and would not be likely to affect viability of a farming unit.
- 5.15 Against the SA objective for *biodiversity*, an *uncertain* score is given. The site is not covered by any protective wildlife designations. The Ecological Impact Assessment (EclA) submitted with application (14/2621/MOUT) regarding protected species indicates that the site supports a small population of slow worms, that several species of bats use forage over the site and along the hedgerows, dormouse is present in the hedgerows, and the site is used by

foraging badgers. It identifies that mitigation should include trapping and translocation of slow worms, provision of reptile habitat and enhancement of existing and planting of new hedgerows to benefit bats and dormouse. The site comprises semi-improved/improved grassland, a common habitat in the area, and loss of 1ha is not considered to be significant, particularly with mitigation and enhancement provided with development.

- 5.16 The site is c.700m to the east from Beer Quarry and Caves Special Site of Special Scientific Interest (SSSI) Area of Conservation (SAC). The SAC is designated primarily for its importance as a hibernation site for a small population of Bechstein's bats, as well as greater and lesser horseshoe bats. The EclA indicates that the development would not have a direct effect on the SAC and on bat species would not be affected by indirect effects (habitat loss) if mitigation measures are delivered. Bechstein's bats feed in woodland rather than foraging open land. Through introducing additional residents in relative proximity (700m) of the SAC the development potentially could lead to increased risk of recreational disturbance on the site, although the number of new residents will be low, site access will be via Mare Road (in the opposite direction to the SAC), and the caves are a tourist site with managed access, and so the potential for such adverse effects is considered to be very low.
- 5.17 A separate Habitats Regulations Assessment (HRA) has been undertaken to specifically assess whether Policy H3 and development on the Site Allocation could result in an adverse effect on the integrity of European Sites (the SAC) and to identify measures to avoid or mitigate any adverse effects. The HRA identifies that loss of foraging habitats, fragmentation and reduced habitat connectivity, and disturbance to habitat (due to light pollution), as a result of development on the site could result in an adverse effect on the bats associated with the SAC. The HRA recommends additions to Policy H3 to ensure that a Bat Mitigation Strategy is developed to ensure that development on the site would ensure that impacts to bats associated with Beer Quarry are avoided including through maintaining suitable commuting routes to prevent habitat fragmentation. Therefore, although the development of the site is considered likely to have minor negative and minor positive effects on biodiversity overall, an 'uncertain' score in this SA is considered appropriate, which could become *neutral* or *minor positive* should the measures and changes to H3 proposed in the HRA be adopted.
- 5.18 Locally important County Wildlife Sites are present close to the site: Beer Quarry and Caves CWS covers an extensive area of grassland and woodland important for flora and foraging bats and birds. Bovey Lane Fields CWS is 5ha and covers the south facing slopes north of Bovey Lane and is important for

unimproved calcareous grassland and flower-rich meadows. Bovey Lane Quarries CWS is also important for calcareous grassland and flower rich meadows. Adverse effects could occur through increased access and damage to flora, but development of 31 new dwellings, with access via Mare Lane to the east of the site is not considered to be likely to directly or indirectly affect the sites. Therefore, the overall effect is considered to be mixed with loss of habitat and effect on protected species mitigated through translocation, habitat creation, management and enhancement.

- 5.19 Given the recommendations of the HRA, including amendments to Policy H3 to mitigate adverse effects, it is likely that development would not have an adverse effect on the SAC, but this depends upon implementation of the Policy. Therefore, although the development of the site is considered to have minor negative and minor positive effects on biodiversity overall, an 'uncertain' score in this SA is considered appropriate.
- 5.20 Against other SA objectives, the appraisal scores the potential likely effects as *neutral* given low likelihood of significant or minor effects on these.

Alternatives – Sites 1, 3 and 4

- 5.21 The detailed appraisal of each site is set out in **Appendix 1** to this report. All were assessed as having a *significant negative* effect on *landscape*, scoring worse than the Site Allocation. The reasoning for this is due to all of these being in open countryside beyond the edge of the village and on sites that would be highly visible including from roads entering the village and/or existing dwellings, adversely affecting landscape character and quality, and the setting of the village. All lie within the East Devon Landscape Character Type 'Coastal slopes and combes' and would involve loss of features important to this landscape type. Sites 1 and 3 are also within the AONB, the Coastal Preservation Area and Heritage Coast. Site 4, while outside of the AONB is also within the Coastal Preservation Area and Heritage Coast and development would be very prominent when approaching the village and would adversely affect the character of the open coast interrupting views towards the sea.
- 5.22 The findings of the appraisal of each site are set out in the appraisal in **Appendix 1**. In summary, these are:

Site 1 - Land between Quarry Lane and Paezens Lane

- 5.23 The site lies on the edge of the village, extending in a linear fashion down Quarry Lane and Paezens Lane, and as such would increase the physical

extent of the village to the west and effectively be 'ribbon' development along Quarry Lane. Development on the site would be highly visible from the road and extend the village into a part of the AONB with undeveloped character.

- 5.24 The site is also within the Coastal Preservation Area designation in the East Devon Local Plan, but given its location some distance inland development would not be likely to significantly harm the undeveloped/open status of the Area as a whole, visual connectivity, or views to and from the sea. The Heritage Coast designation washes over the site but again as it is some distance inland it would not make a significant contribution to preservation of the undeveloped nature of the coast.
- 5.25 Minimising visual impact, and impact on landscape character and reducing harm to the natural beauty of the AONB, would depend on design and planting/landscaping, although given the relatively exposed and linear nature of the site, and the need to remove existing vegetation to accommodate development, this is likely to be less effective and possible than at site 2. Therefore, the overall effect would be *significant negative* effect on the SA objective regarding *landscape*, which would be long-term, and permanent.
- 5.26 The site is also proximate and closer to the Beer Quarry and Caves SAC but as with development on site 2, the effects are *uncertain* with the potential effects of the Neighbourhood Plan being considered in detail in the separate Habitats Regulations Assessment.
- 5.27 Scores against other objectives do not indicate significant effects. Scores are similar to those for the Site Allocation, with the exception of the SA objectives on *housing, communities*, and *vitality and viability* of the settlement which while positive are only *minor positive*, due to the location of the site further from the village centre and likelihood that due to its size and shape it would not be able to deliver the same amount of housing.

Site 3 - Field to South of Park Road to the West of Southdown

- 5.28 The site lies on the edge of the village, on the opposite side of the road to existing dwellings. The site rises steeply from Park Road and so would be very prominent and by extending the area of developed land into open countryside to the south would be likely to have an adverse effect on landscape and landscape character, and the setting of the village.
- 5.29 The site is also within the Coastal Preservation Area designation in the East Devon Local Plan, and given its location on the south of the village

development would be likely to significantly harm the undeveloped/open status of the Area as a whole and visual connectivity, although the topography means that it would not affect views to the sea. The Heritage Coast designation washes over the site but again due to topography development does not make a significant contribution to preservation of the undeveloped nature of the coast. Development of the site would be likely to affect at least one of the Valued Skylines identified in the NDP.

- 5.30 As with other sites, minimising visual impact, and impact on the SA objective relating to *landscape* character and the AONB, would depend on design and planting/landscaping, although given the relatively small size and exposed nature of the site, this is likely to be less effective and possible that at site 2. Therefore, the overall effect would be *significant negative*, local, long-term, and permanent.
- 5.31 Scores against other SA objectives do not indicate significant effects. Scores are similar to those for the Site Allocation, with the exception of *housing, communities, and vitality and viability* of the settlement which while positive are only *minor positive*, due to the location of the site further from the village centre and likelihood that due to its small size it would not be able to deliver the same amount of housing.

Site 4 - Land off New Road

- 5.32 While outside of the AONB, the site is open countryside outside of the Built Up Area Boundary, and within the proposed Beer Local Gap. It is a prominent and highly visible site, particularly from the B3174 New Road looking towards the sea.
- 5.33 It is within the Coastal Preservation Area and given its size and location development would be likely to significantly harm the undeveloped/open status of the area as a whole visual connectivity, or views to and from the sea. The Heritage Coast designation washes over the site and, given the proximity to the coastline, the site makes a contribution to the preservation of the undeveloped nature of the coast.
- 5.34 Being a site that is physically separate from the rest of Beer, and which is large and visually prominent, development on the site would have significant local landscape impacts, particularly on the Coastal Preservation Area, Heritage Coast and the landscape character, and would significantly extend the built-up area eastwards towards Seaton. This would severely undermine the purpose of the proposed Local Gap and adversely affect the setting of Beer and separation between the village and Seaton.

- 5.35 As with other sites, minimising visual impact, and impact on landscape character, would depend on design and planting/landscaping, although given the exposed and highly visible and coastal nature of the site, this is likely to be less effective and possible than at site 2. Therefore, the overall effect would be significant negative, local, long-term, and permanent
- 5.36 As with the Site Allocation, this site scores as *significant positive* against the SA objective relating to housing, as due its size it could deliver a large number of houses. While scoring positive against the SA objectives for communities, and vitality and viability of the settlement due to the potential delivery of housing, it is only *minor positive*, due to the location of the site physically separated from, and so not being well integrated with, the rest of the village that may reduce the positive contribution to this objective.
- 5.37 The appraisal against other objectives do not indicate likely significant effects. Scores are the same as to those for the other sites including the Site Allocation.

Table 5. Summary of SA for the Site Allocation (Policy H3) and Alternative Sites

| Site | 1. Decent homes | 2. Community Services | 3. Education & skills | 4. Health | 5. Crime | 6. Noise | 7. Culture, social & leisure provision | 8. Historic assets | 9. Landscape character | 10. Amenity/local environment | 11. Biodiversity | 12. Sustainable Transport | 13. Air, soil and water | 14. Greenhouse gas emissions | 15. Flood risk | 16. Energy consumption | 17. Waste reduction | 18. Employment | 19. Vitality & viability of towns | 20. Encourage investment |
|--------------------------|-----------------|-----------------------|-----------------------|-----------|----------|----------|--|--------------------|------------------------|-------------------------------|------------------|---------------------------|-------------------------|------------------------------|----------------|------------------------|---------------------|----------------|-----------------------------------|--------------------------|
| Site Allocation (Site 2) | ++ | ++ | + | + | 0 | 0 | 0 | 0 | - | -? | ? | + | -? | + | + | 0 | 0 | + | ++ | + |
| Alternative Site 1 | + | + | + | + | 0 | 0 | 0 | 0 | + | - | ? | + | -? | + | + | 0 | 0 | + | + | + |
| Alternative Site 3 | + | + | + | + | 0 | 0 | 0 | 0 | + | - | 0 | + | - | + | + | 0 | 0 | + | + | + |
| Alternative Site 4 | ++ | + | + | + | 0 | 0 | 0 | 0 | + | - | 0? | + | - | + | + | 0 | 0 | + | + | + |

6. SUSTAINABILITY APPRAISAL/SEA OF DRAFT BEER NEIGHBOURHOOD PLAN AS A WHOLE

- 6.1 The appraisal of the Plan as a whole, including Policy H3, is set out in **Appendix 2** of this report, and is summarised in Table 6 below.
- 6.2 This indicates that it generally performs well against the SA objectives, as organised by 'theme'. This is due to the policies generally providing additional detail to the policies in the Local Plan and in NPPF regarding the quality of development that is required, and the protection afforded to features and character of Beer.
- 6.3 The scale of new development likely to come forward and be acceptable in Beer is likely to be limited, given the constraints within the village (including the Conservation Area and lack of sites and physical space) and in the surrounding countryside (AONB, Coastal Preservation Area, proposed Local Gap), and therefore the impact of some policies will also be limited.
- 6.4 The NP performs *significantly positive* against the Communities, Population, Housing and Health SA theme through proposing the site allocation to deliver much needed housing on a site that is considered to be deliverable and acceptable. In the absence of this policy (H3) it is unlikely that sufficient housing would be deliverable to meet identified needs. As set out in the site allocation appraisal, development of this site (Short Furlong) would have a negative effect on the landscape partly as it would be within the AONB, but this effect is considered to be less severe than development of any of the alternative sites. It also provides strong protection for community and recreational facilities.
- 6.5 It also scores *significant positive* against the Economy, Skills and Employment SA theme, through protecting and promoting tourism-related development, and applying stringent requirements on proposals that may result in the loss of commercial space within the village centre which will also help to improve viability and vitality of the village.
- 6.6 *Significant positive* effects are also indicated against the Historic and Cultural Heritage SA theme, as the Plan protects heritage assets and the character of the village, and requires high quality development to be sympathetic to this. As set out in the appraisal of the Site Allocation, although this site within the AONB, its development, with mitigation, would be likely to have a minor negative effect on landscape overall. Therefore, due to the mitigation measures required by Policy H3, and the suite of policies that provide additional protection to sites and features of local importance to Beer, the

NP as a whole is considered to have a *minor negative* effect on the Landscape, Townscape and Natural Environment SA theme.

- 6.7 The **alternative** that has been appraised (absence of Neighbourhood Plan) assumes that Local Plan policies and the NPPF would apply to developments in the village. While many policies provide for protection of natural and built environment and assets, and encourage development that would benefit communities, they apply to the whole district and so are not specific to Beer's needs, and so their effects are difficult to assess. For a number of themes and objectives, therefore, the appraisal has indicated that in adding detail specific to Beer (above and beyond the policies of the EDLP) the NP would be likely to have a generally positive effect. The absence of a Site Allocation in the AONB, with potentially *minor negative* effects on landscape character, also results in a more positive score for the alternative of 'no NP'.

Table 6. Summary of SA on the Neighbourhood Plan as a whole

| Themes & Objectives | SA Score |
|---|----------|
| Communities, Population, Housing and Health 1. Housing: To ensure everybody has the opportunity of a decent home 2. Communities: To ensure that all groups of the population have access to community services 4. Health: To improve the population's health 5. Crime: To reduce crime and the fear of crime 7. Cultural, social and leisure provision: To maintain and improve cultural, social and leisure provision | ++ |
| <i>Alternative to NP</i> | + |
| Economy, skills & employment 3. Education & Skills: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs 18. Employment: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce 19. Vitality & viability of towns: To maintain and enhance the vitality and viability of towns 20. Encourage investment: To encourage and accommodate both indigenous and inward investment | ++ |
| <i>Alternative to NP</i> | + |
| Amenity 6. Noise: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution 10. Amenity/local environment: To maintain the local amenity, quality and character of the local environment | + |
| <i>Alternative to NP</i> | + |

| | |
|---|-----|
| Transport & Movement | +/- |
| 12. Sustainable transport: To promote and encourage non-car based modes of transport and reduce journey lengths | |
| <i>Alternative to NP</i> | ? |
| Energy, climate and resources | +/- |
| 14. Greenhouse gas emissions: To contribute towards a reduction in local emissions of greenhouse gases | |
| 16. Energy & consumption: To ensure energy consumption is as efficient as possible | |
| 17. Waste reduction: To promote wise use of waste resources whilst reducing waste production and disposal | |
| <i>Alternative to NP</i> | ? |
| Air, Soil and Water | 0 |
| 13. Air, soil and water: To maintain and enhance the environment in terms of air, soil and water quality | |
| 15. Flood risk: To ensure that there is no increase in the risk of flooding | |
| <i>Alternative to NP</i> | 0 |
| Historic & Cultural Heritage | ++ |
| 8. Historic assets: To maintain and enhance built and historic assets | |
| <i>Alternative to NP</i> | + |
| Landscape, townscape & natural environment | - |
| 9. Landscape character: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon | |
| 11. Biodiversity: To conserve and enhance the biodiversity of East Devon | |
| <i>Alternative to NP</i> | + |

7. MONITORING

- 7.1 The NP highlights that there is no statutory requirement for the impact of the Plan and its policies to be monitored. However, to meet the requirements of the SEA Directive a monitoring process needs to be set out.
- 7.2 The EDLP SA includes recommended indicators to be used to monitor progress against the SA Objectives. Many of these are not routinely monitored at the scale of a parish, or the scale and rate of change at parish level will not enable (or require) meaningful monitoring. However, they do provide a starting point for a framework for monitoring.
- 7.3 Given the difficulties of monitoring against a full suite of indicators at parish level, it is proposed that indicators relevant to each theme used in the SA of

the NP, as a whole, are considered (Table 7 below). Recommended indicators are set out below, some of which reflect those in the EDLP SA, the themes of the NP policies, and a number of which are collated and reported by ONS. Others may be recorded by EDDC or by Beer PC through monitoring of planning applications, as referred to in the NP.

Table 7. Suggested Indicators

| Themes & Objectives | Indicators |
|---|--|
| Communities, Population, Housing and Health 1. Housing: To ensure everybody has the opportunity of a decent home 2. Communities: To ensure that all groups of the population have access to community services 4. Health: To improve the population's health 5. Crime: To reduce crime and the fear of crime 7. Cultural, social and leisure provision: To maintain and improve cultural, social and leisure provision | <ul style="list-style-type: none"> No. homes built (annually/plan period) % new homes that are affordable Pupils/places at village school % population in good/very good health Age structure of population Number and range of community assets |
| Economy, skills & employment 3. Education & Skills: To provide for education, skills and lifelong learning to meet the needs of the local population and meet local employment needs 18. Employment: To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce 19. Vitality & viability of towns: To maintain and enhance the vitality and viability of towns 20. Encourage investment: To encourage and accommodate both indigenous and inward investment | <ul style="list-style-type: none"> % population that is economically active Range of services provided in Beer village Number and floorspace of employment land and buildings incl retail Car park capacity |
| Amenity 6. Noise: To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution 10. Amenity/local environment: To maintain the local amenity, quality and character of the local environment | <ul style="list-style-type: none"> Number of noise complaints to EDDC |
| Transport & Movement 12. Sustainable transport: To promote and encourage non-car based modes of transport and reduce journey lengths | <ul style="list-style-type: none"> % homes within walking distance of Beer village centre Number & frequency of bus services |
| Energy, climate and resources 14. Greenhouse gas emissions: To contribute towards a reduction in local emissions of greenhouse gases 16. Energy & consumption: To ensure energy consumption is as efficient as possible 17. Waste reduction: To promote wise use of waste resources whilst reducing waste production and disposal | <ul style="list-style-type: none"> Small scale renewable energy installations installed annually/over Plan period |

| | |
|--|--|
| <p>Air, Soil and Water</p> <p>13. Air, soil and water: To maintain and enhance the environment in terms of air, soil and water quality</p> <p>15. Flood risk: To ensure that there is no increase in the risk of flooding</p> | <ul style="list-style-type: none"> • New buildings within Flood Zone 2,3 and 1. |
| <p>Historic & Cultural Heritage</p> <p>8. Historic assets: To maintain and enhance built and historic assets</p> | <ul style="list-style-type: none"> • Number of Heritage assets 'at risk' • Parish Council objections to developments on basis of impact on heritage incl Conservation Area |
| <p>Landscape, townscape & natural environment</p> <p>9. Landscape character: To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon</p> <p>11. Biodiversity: To conserve and enhance the biodiversity of East Devon</p> | <ul style="list-style-type: none"> • Area of development on greenfield and brownfield sites • New dwellings built inside AONB, CPA, & Local Gap • Conservation status of SSSIs • Loss or damage to County Wildlife Sites |

8. CONCLUSIONS

- 8.1 The Site Allocation (Short Furlong – Site 2) proposed in Policy H3 of the NP performs well against the majority of SA objectives, particularly when compared against the 'reasonable alternatives' (the other 3 sites that were consulted on). In providing for much-needed housing, particularly affordable housing for those with 'local connections', it has a *significant positive* effect on those for *Housing and Communities*, and a synergistic positive effect on the *Vitality and Viability* of the village.
- 8.2 There is a clear tension between provision of housing and with the objectives to conserve land and protect and enhance the Landscape Character, given that in order to deliver sufficient housing to meet the village's and parish's needs, development would need to be on sites outside of the Built Up Area Boundary of Beer village, and so be in countryside covered by protective designation including, in the case of Sites 1, 2 and 3, within the AONB. Despite being within the AONB and having a minor negative effect on landscape, the Site Allocation (Policy H3) is assessed as having a less significant impact on *Landscape character* than development at any of the alternative sites given their location and characteristics.
- 8.3 The Neighbourhood Plan, as a whole, performs well against all of the SA themes (grouped SA objectives) used in the SA of the Plan, with no *significant negative* effects. Through policies that seek to conserve and enhance

landscape character and biodiversity, including locally important landscape and nature conservation features and sites, the NP provides additional detail over and above the Local Plan. However, given that Policy H3 allocates a site within the AONB, this results in an overall assessment of *minor negative* effects against the Landscape, Townscape and Natural Environment SA theme, although the policy requires mitigation of adverse effects.

- 8.4 The NP scores *significantly positive* against the Communities, Population, Housing and Health, and Economy, Skills and Employment SA themes through providing for additional housing to meet local needs, and protecting employment and retail space within the village, and benefitting the vitality and viability of the village and its services. It also scores *significant positive* against Historic and Cultural Heritage through providing strong protection for historic assets and the character of Beer village.
- 8.5 In the absence of the NP (the *alternative* approach), the Local Plan policies, and the NPPF, would apply. The Neighbourhood Plan adds valuable local interpretation, reflecting specific local priorities, and so performs more positively against a number of SA themes than under the alternative approach of relying on national and Local Plan policy. However, due to the potential *minor negative* effects of the Site Allocation within the AONB, the alternative (no NP) scores more positively against the Landscape, Townscape and Natural Environment SA theme.