Draft Strategic Environmental Assessment – Screening Statement for NA3, Wolborough Development Framework Plan

1. Background

- 1.1 The draft NA3 Wolborough, Newton Abbot Development Framework Plan (DFP) has been prepared in line with the Teignbridge Local Plan 2013–2033.
- 1.2 The draft DFP expands on the requirements set out in Policy NA3, for employment, housing, education, social and community facilities, link road, green infrastructure, sustainable movement and Ecology.
- 1.3 The draft DFP includes a Framework Plan for the NA3 allocation.

2. SEA Screening

- 2.1 Strategic Environmental Assessment (SEA) is a process to identify likely significant effects of a plan or policy on the environment. The requirement to assess certain plans and programmes is set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which transpose the European Strategic Environmental Assessment Directive (2001/42/EC). An SEA is required where plans may have significant environmental effects. Schedule 1 of the Regulations set out the criteria for determining whether an SEA is required and these are considered below:
 - The characteristics of plans and programmes, having regard, in particular to:
 - a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
 - b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
 - c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
 - d) environmental problems relevant to the plan or programme; and
 - e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

- Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
 - a) the probability, duration, frequency and reversibility of the effects;
 - b) the cumulative nature of the effects;
 - c) the transboundary nature of the effects;
 - d) the risks to human health or the environment (for example, due to accidents);
 - e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - f) the value and vulnerability of the area likely to be affected due to
 - i. special natural characteristics or cultural heritage;
 - ii. exceeded environmental quality standards or limit values; or
 - iii. intensive land-use; and
 - g) the effects on areas or landscapes which have a recognised national, Community or international protection status.
- 2.2 The draft DFP sets out additional detail on the implementation and delivery of Local Plan Policy NA3 Wolborough. This has already been subject to Strategic Environmental Assessment (SEA), Sustainability Appraisal and Habitats Regulations Assessment (HRA).
- 2.3 The Local Plan assessment took account of the environmental characteristics of the site and area, which have not changed since those assessments were prepared. The draft DFP sets out a framework of delivery of the site's development. Therefore, whilst additional details are contained within the DFP, these are within the parameters of the policy framework, already set out in the Local Plan.
- 2.4 The draft DFP will not influence other plans in a hierarchy, but is itself, highly influenced by the Local Plan, which has already been subject to Strategic Environmental Assessment. The draft DFP does not differ from the Local Plan requirements.
- 2.5 The Local Plan has also been subject to assessment under the Habitats Regulations and the Local Plan policies contain appropriate requirements needed to mitigate any impacts on the South Hams SAC, prepared in conjunction with Natural England. The draft DFP itself has been subject appropriate assessment for the purpose of Habitats Regulations Assessment. It includes mitigation measures that are necessary for the protection of biodiversity including Greater Horseshoe Bat flyways and foraging areas, which has been used to inform illustrative layouts for the site.

2.6 The Sustainability Appraisal/Strategic Environmental Assessment accompanying the Proposed Submission Local Plan assessed the environmental impacts of Policy NA3. The following table demonstrates any implications or variations that have arisen from the draft DFP and which may require further SEA.

Table 1: SEA Screening

SA/SEA Sustainability Objective	SA/SEA Comment on Policy NA3	Relevant DFP Details	Implications of DFP	Further SEA Required?
A. Natural Environment To protect, conserve and enhance the area's natural environment	It is a predominately agricultural with a varied topography. There are trees and hedgerows throughout some of which are protected, these will need consideration in any development. Proposals have the potential to impact on bats, in particular the Greater Horseshoe Bat, and their flyways as well as cirl buntings, barn owls and their territories. There may also be impacts on other protected species. Any impact on protected species Any impact on protected species will need to be assessed and appropriately mitigated and compensated for.	 The draft DFP (pp.27-29) provides further detail in relation to mitigation and compensation for biodiversity, specifically in relation to there being essential objectives in place to provide: Greater Horseshoe Bat mitigation in accordance with the HRA Appropriate Assessment; Cirl bunting mitigation; Greater Crested Newt protection and mitigation; Barn Owl roost protection; Retention of the existing nesting site(s) for Swallows; Diverse grassland protection; A planting scheme to provide additional green infrastructure; Retention and buffering of hedgerows, Devon banks, trees and woodland; 	The draft DFP provides a more detailed understanding of the site's constraints and sets out the necessary objectives to ensure the appropriate mitigation and compensation of biodiversity across the site. A separate HRA Appropriate Assessment for the South Hams Special Area of Conservation (SAC) has been undertaken which recommends a series of mitigation measures. On the basis that these are effectively implemented the Appropriate Assessment concludes that there will be 'no likely significant effect' on the SAC.	No

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	Part of the area is adjacent to a Local Nature Reserve, a Site of Special Scientific Interest and a County Wildlife Site. Further assessment on the potential impacts of these will be required especially in relation to the SSSI to ensure any development does not detrimentally impact its hydrology.	 Net gains to biodiversity all supported by adequate and up to date species and habitat surveys. The Framework Plan (p14) shows how the proposed layout of development has responded to the location of key biodiversity habitats. A blanket TPO covers all trees within the NA3 allocation. Retain (where appropriate) the pattern of existing heads, trees and woodland as per page 26 of the draft DFP. Pages 27-29 also set out the objectives and principles to be followed in relation to respecting landscape and views in and around the development area. 		
B. Built Environment To preserve and improve the area's built	The area is primarily farmland on the edge of the town. A new connected neighbourhood would result in sustainable development. Sensitive	The draft DFP requires the development to comply with the Council's emerging Design Guide SPD. In advance of this being adopted, pages 43-65 of the draft DFP sets out some design objectives	The draft DFP sets out detailed objectives in relation to how the existing built and historic environment will be protected and how new development can be built to a high standard of design and	No

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environment and heritage assets	and high quality design of new development with appropriate density will ensure it responds to its wider context. Incorporating landmark developments at gateway sites will also ensure a strong approach to the town. The wider historical context of the site will also need consideration. Part of the allocation is close to a conservation area and there are a number of listed buildings in close proximity including a Grade 1 listed church. As such careful consideration will need to be given to the siting, design, layout and landscaping of any development in close proximity.	relating to the design which seek to ensure an attractive, safe and accessible built environment with distinctive features and buildings and sufficient parking provision. High quality design and layout is required, including active frontages, high densities and design quality, and focal buildings around green and public spaces and at prominent locations. Nearby historic assets which have the potential to be affected by the proposed development are set out in the Heritage Strategy on page 39 of the draft DFP. It also explains the significance of these historic assets and shows how the listed buildings, Country Park, existing buildings and their settings around the site can be respected. The listed buildings, existing buildings and their settings around the site are respected through the proposed	layout. The relevant objectives and general principles listed throughout the document provide a framework for good quality design and the Framework Plan responds to this direction in a way which seeks to achieve this.	

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		layout shown on the Framework Plan (page 14). The draft DFP Heritage Strategy also identifies the known archaeological features on the site.		
C. Climate Change To mitigate and adapt to possible effects of climate change	Includes need to consider generation of onsite renewable energy at a domestic and community scale as well as rainwater harvesting, recycling and composting. Provision for community and local food production is included. There are some areas of higher risk of flood but these areas can be incorporated with good design into open and green space. There are areas of potential surface flooding, however these could be managed through SUDS development and site planning and design.	The draft DFP reflects the Local Plan Policy requirement to minimise carbon emissions associated with new development through efficient design, renewable energy technologies, quality construction and maximising opportunities for sustainable travel The NA3 Drainage Strategy (page 33) addresses flooding and drainage issues in accordance with EA and lead local flood authority guidance. In the catchment of the SSSI, it will be necessary to ensure that the quality, quantity and reliability of the groundwater feed into the SSSI is not adversely impacted by the proposed development within the SSSI catchment.	A more detailed understanding of the site has refined the site's ability to deliver a comprehensive sustainable development with new community facilities, areas of food production and employment sites. These can be accessed via a network of walking, cycling and bus routes which will also link to routes beyond the boundaries of the development.	No

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	New and enhanced routes are proposed to facilitate walking and cycling and there is support for a wide range of local services and community facilities.	A neighbourhood hub with a range of facilities will help reduce the need to travel for some everyday goods and services. The development will be connected via a network of on- and off-road walking and cycling routes (pages 19-21) to the different parts of the development as well as to main links to the town centre. The DFP also provides a solution for providing at least 1.46ha of allotment plots.		
D. Resource Use To minimise the loss or degradation of finite natural resources	The area is Greenfield with mainly lower grade agricultural land mostly arable. The site is not in a mineral consultation area but there are known deposits of sand and gravel in the area that will need consideration.	The draft DFP continues to direct employment uses to the area included within the 'mineral safeguarding area' as defined by the Devon Minerals Plan 2011-2031. This safeguarding area does not preclude development but means that proposals would have to meet certain criteria as specified by the relevant Minerals Plan policy (M2).	The draft DFP confirms the location of employment development in the Mineral Safeguarding Area. No additional implications to those identified in the full SA/SEA for policy NA3 of the Local Plan.	No

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E. Jobs and Local Economy To foster an entrepreneurial economy with improved productivity, providing a strong employment offer	There is significant employment provision including 10 hectares with a mix of uses and types to help create additional jobs, support the local economy as well as help to increase self-containment. New housing will generate short term employment during build-out. New households will generate economic activity including supporting local shops and businesses.	Local Plan policy NA3 requires 10ha of employment land. The draft DFP sets out how employment land will be provided across the site. This is primarily directed to land at Kingskerswell Road, the A381 Totnes Road, and within and around the Neighbourhood Hub. The draft DFP does not identify land for the 10ha requirement, it is therefore expected that provision for employment land elsewhere in the locality would therefore be required.	The draft DFP currently does not meet the policy requirement to deliver 10ha of employment land on site. However there is flexibility under Local Policy EC3 (Rural Employment) to enable additional employment land outside the allocation area if needed.	No
F. Town Centres To strengthen and safeguard the vitality and viability of our town centres	Potential for additional expenditure to the town centre from new residents	Page 21 of the draft DFP sets out how links to the town centre will be provided. It also contains relevant clauses to ensure no unacceptable impact on the town centre as a result of new retailing proposals.	The draft DFP ensures adequate links to the town centre are retained and created, and that the town centre is not negatively affected by the proposed development.	No
G. Housing To provide and maintain a sufficient supply of good quality,	Meeting a significant proportion of the area's housing need.	Page 17 of the draft DFP sets out objectives for a range of housing types and tenures, including affordable and custom build.	Currently, the draft DFP demonstrates that approximately 1,300 homes can be delivered on- site. This falls short of the Local Plan Policy NA3(c) requirement	No

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mixed housing, including an appropriate level of affordable housing		Detailed analysis of the site including landscape analysis has led to the conclusion that the preferred form of development would involve very limited amounts of housing development outside the Local Plan defined allocation area. It is anticipated that this could occur south of Neighbourhood 3 and 4 as shown on pages 62 - 65.	that the development should deliver at least 1,500 homes. However, capacity testing and masterplanning work is ongoing in order to identify ways to reach the policy requirement. Therefore this estimate of 1,300 homes could be increased at the detailed planning application stage.	
H. Health To support healthy lifestyles and a healthy local living environment	It provides proximity and potential connectivity to existing health and social centres as well as incorporating new facilities within in. Provision of housing, jobs, recreational opportunities and increase sustainable travel opportunities could lead to a general improvement in public health.	The draft DFP expects a range of community and open space facilities, including a neighbourhood hub (including community centre and retail units), walking and cycling routes, parkland, natural green space, play areas and allotments. A proposed distribution of these uses is shown on page 12.	The range and quality of homes and provision of a range of onsite community facilities and services, and extensive green infrastructure network will all have a positive bearing on health and wellbeing of residents on-site and in adjacent localities.	No
I. Infrastructure To ensure sustainably balanced places are created or	A significant range of infrastructure improvements will benefit the community, including; a network of new vehicular	Pages 70-73 of the draft DFP contains a schedule of infrastructure for the site. This includes all NA3 policy requirements and provides up to date details (collected in	The draft DFP expects a range of infrastructure items which will all have a positive impact on the provision of local services and facilities.	No

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maintained, providing access to an appropriate mix of services and facilities	routes, new bus services, cycle lanes and footpaths, and facilities for generation of on-site renewable energy. There will also be a range of local shops & community facilities to support a new sustainable urban extension which will include schools, health care, faith facilities and a broad spectrum of open/play/green spaces. This includes significant investment and provision of green infrastructure.	consultation with infrastructure providers) as to how they expect them to be delivered and who would be responsible for their delivery.		

3. Variations

- 3.1 The SEA screening should assess any variations to the relevant policies that the SPD has introduced. There are a few aspects of the draft DFP which vary slightly from the detail contained in the Local Plan. These variations relate to the provision of some elements of the development offsite and are justified by further work and discussions, including changes in advice from expert consultees and detailed masterplanning work.
- 3.2 The variations are influenced by an improved understanding of a number of challenges which, if not effectively dealt with, risk delivery of the site. These include:
 - **Topography -** The allocation is bisected by a strong ridgeline along Stoneman's Hill that runs approximately north-west to southeast, separating Newton Abbot from Abbotskerswell. Decoy Brake / Blackball Plantation lies along a Spur from this ridge. Land to the west of Stoneman's Hill drops down towards the A381 Totnes Road. Land to the east of Stoneman's Hill has a steep gradient down towards Decoy, which forms a catchment for the Fen SSSI.
 - **Flood risk and drainage -** Trunk water mains across the site South West Water Hydrology catchment for the Wolborough Fen SSSI and existing watercourses.
 - Landscape character Woodland, hedgerows, rolling hills, farmland and network of public rights of way. Having assessed the reasonable alternatives and the conclusions of the original SA/SEA undertaken for the Local Plan, it is considered that the overall impact on the local environment will not be significantly different from the Local Plan SEA as a result of the slight extension to the boundary of the allocation.
 - Landscape and heritage Setting of the Grade 1 Listed parish Church of St Mary the Virgin, Wolborough Hill Conservation Area, St Augustine's Priory, Wolborough Barton Farm and Hennaborough Barn.
 - Infrastucture The requirement for a number of key infrastructure items and facilities, namely employment land, a primary school, multi-purpose community building, open spaces and play areas, local shops and a new main street running on an east west alignment through the site.
 - Site features and ecology There a number of other ecological features across the site to be considered which include: a network of high quality, unimproved meadows supporting a herb rich plant community; areas of dry stone walls and unimproved meadows likely to support reptiles; small copses of mature broadleaved woodland providing bird nesting sites); historic orchards; watercourses; Wolborough Fen SSSI; and bat roosting sites and flyways (The southern extent of NA3

falls within a strategic flyway for Greater Horseshoe Bats which are protected by European legislation through the South Hams Special Area of Conservation (SAC)).

• Employment - Policy NA3 requires the provision of at least 10ha of land for employment development. In order to improve deliverability of the employment land, the draft framework plan shows a small portion of employment land partly outside the allocation area in Neighbourhood 4. Provision in this location will enable clustering of business uses, economic uses, economies of utilities provision and servicing, and minimise impact on neighbouring uses. Neighbourhood 4 is the most accessible part of the NA3 allocation allowing commercial traffic access from the South Devon Link Road and from the A381 Totnes Road via the new link road running through the development. Having assessed the reasonable alternatives and the conclusions of the original SA/SEA undertaken for the Local Plan, it is considered that the overall impact on the local environment will not be significantly different from the Local Plan SEA as a result of the slight extension to the boundary of the allocation. In addition, the proposed extension accords with Local Plan Policy EC3 (Rural Employment).

The collective constraints mean that the area in which development can take place is significantly less than the overall area of the allocation. Within this developable area, a number of key infrastructure items and facilities need to be planned for, namely education provision, community centre, open spaces and play areas, local shops and a new road connecting the A381 to the A380 South Devon Link Road. This new road improves accessibility into and out of, and across Newton Abbot.

- 3.3 Developing a site such as this is costly and the development therefore needs to maximise its potential for building higher value uses (i.e. housing) in order to fund the necessary infrastructure. The variations therefore relate to the proposal to deliver some uses off site where there is a shortfall of provision on site to maximise the availability of the allocation area for housing and community uses. These uses are:
 - improvement of existing nearby playing pitches at Decoy Country Park; and
 - a proportion of the employment land being provided offsite.
- 3.4 It is not considered that these variations lead to any conflict with higher tier policy and that, overall, the draft DFP sets out a framework for meeting the requirements of the Local Plan. The provision of the above uses can be provided in accordance with other relevant Local Plan policies, namely Policy WE11 for replacement and additional playing pitches and EC3 for employment land.

4. Conclusion

4.1 The SEA screening indicates there are no new significant effects likely to arise through the implementation of the draft NA3 Wolborough Draft Development Framework Plan that have not previously been identified through the full SA/SEA of the Teignbridge Local Plan. Therefore full Strategic Environmental Assessment of the NA3 Development Framework Plan is not required.

12th July 2018