



# **East Devon Villages Development Plan Document**

## **Sustainability Appraisal Report (updated to incorporate Main Modifications) – Non-Technical Summary**

**December 2017**

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## Introduction

- 1.1 This is the Non-Technical Summary of the Sustainability Appraisal Report that has been prepared for the East Devon Villages Plan.
- 1.2 Sustainability Appraisal (SA) is used to assess key plans and strategies such as the Villages Plan against a set of sustainability objectives, in order to identify the likely significant effects of a plan on social, economic and environmental issues. East Devon District Council have carried out the SA, with support from independent consultants (LUC).
- 1.3 This Non-Technical Summary relates to the SA report which is being published for consultation alongside the East Devon Villages Plan incorporating Main Modifications. The consultation period runs from 18 December 2017 to 2 February 2018.

## The Villages Plan

- 1.4 East Devon District Council adopted its [Local Plan 2013 – 2031](#) in January 2016. The Local Plan sets out the long term spatial vision and objectives, providing policy to address the bulk of development proposals and planning applications across East Devon. The Local Plan was accompanied by a [Sustainability Appraisal Report](#).
- 1.5 The Local Plan makes clear that growth and development is generally acceptable within Built-up Area Boundaries (BUABs), subject to meeting certain criteria (Strategy 6). However, the Local Plan only identified BUABs for the Towns, and stated that a Villages Plan will be produced to identify BUABs at the 15 villages listed in Strategy 27.
- 1.6 The Villages Plan does not seek to adjust or alter Local Plan policy wording; its overriding task is to put Built-up Area Boundaries (define black lines) on to village maps. The scope of the Villages Plan, as set out in the Local Plan is:
  - the definition of Built-up Area Boundaries around the 15 settlements listed in Strategy 27 of the Local Plan (with the exception of Lympstone as it has a made neighbourhood plan);
  - the identification of any local plan policies on specific settlement ‘inset’ plans; and
  - defining inset plans for Greendale and Hill Barton Business Parks.
- 1.7 The Villages Plan includes overarching policies that explain Built-up Area Boundaries and the approach at Greendale and Hill Barton Business Parks, and policies for retail/commercial area and frontage protection for Beer and Colyton (resisting ‘loss’ to other uses, notably residential).
- 1.8 During the Examination of the Villages Plan, the Inspector considered that Main Modifications would be required to make the plan ‘sound’; therefore, this SA Report non-technical summary relates to the East Devon Villages Plan incorporating Main Modifications. It has been informed by SA consultation findings at the ‘Scoping’ stage, and the ‘draft’ stage.

# Sustainability Appraisal

- 1.9 East Devon District Council is required by law to carry out Sustainability Appraisal and Strategic Environmental Assessment (SEA) of the Villages Plan. The Government recommends that these two legal requirements are addressed by carrying out a single process: Sustainability Appraisal.
- 1.10 SA should ensure that the plan preparation process maximises the contribution to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan alongside its development.
- 1.11 SA must be carried out in accordance with Government guidance and, as it is integrated with SEA, must meet the requirements of a European Directive that has been transposed in the UK by the SEA Regulations. SA is an integral part of the plan-making process, as highlighted in the following table.

**Table 1: Stages of Plan-making and SA**

<b>Local Plan Step 1: Evidence Gathering and engagement</b>
SA stages and tasks
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <p>1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>2: Collecting baseline information</p> <p>3: Identifying sustainability issues and problems</p> <p>4: Developing the SA framework</p> <p>5: Consulting on the scope of the SA</p>
<b>Local Plan Step 2: Production</b>
SA stages and tasks
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <p>1: Testing the Plan objectives against the SA framework</p> <p>2: Developing the Plan options</p> <p>3: Evaluating the effects of the Plan</p> <p>4: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>5: Proposing measures to monitor the significant effects of implementing the Plans</p>
<b>Stage C: Preparing the Sustainability Appraisal Report</b>

1: Preparing the SA Report
<b>Stage D: Seek representations on the Plan and the Sustainability Appraisal Report</b>
1: Public participation on Plan and the SA Report
2(i): Appraising significant changes
<b>Local Plan Step 3: Examination</b>
SA stages and tasks
2(ii): Appraising significant changes resulting from representations
<b>Local Plan Step 4 &amp; 5: Adoption and Monitoring</b>
SA stages and tasks
3: Making decisions and providing information
<b>Stage E: Monitoring the significant effects of implementing the Plan</b>
1: Finalising aims and methods for monitoring
2: Responding to adverse effects

**Stage A: Scoping**

- 1.12 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues.
- 1.13 The SA process began in March 2016 with the production of a Scoping Letter for the Villages Plan. Given the narrow scope of the Villages Plan, plus the fact that a detailed SA Scoping consultation had already been undertaken for the East Devon Local Plan, a consultation Scoping letter was prepared instead of a full Scoping Report. This set out the scope of the SA work that would be undertaken for the Villages Plan and was sent to the statutory environmental bodies (Environment Agency, Natural England, Historic England) for comment.
- 1.14 A number of amendments were made following consultation on the Scoping Report, to ensure the full range of baseline information, policy context, sustainability issues was presented. This also resulted in some minor changes to the SA objectives, which are presented below:
  - 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
  - 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 levels of noise pollution.
7. To maintain and improve cultural, social and leisure provision.
8. To maintain and enhance the historic environment, heritage assets and their settings.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.
10. To maintain the local amenity, quality and character of the local environment.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.
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, particularly in the River Axe which does not currently meet Water Framework Directive targets.
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.
15. To ensure that there is no increase in the risk of flooding as a result of development.
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.

## **Stage B: Developing and refining options and assessing effects**

- 1.15 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other "reasonable alternatives" to the options being considered for a plan.
- 1.16 It is worth highlighting that only "likely significant effects" must be identified, not all possible effects. It should also be noted that any alternatives (also referred to as 'options') considered to the plan need to be "reasonable". A reasonable alternative should be a different way of fulfilling the objectives of the plan, which should be realistic and deliverable, and fall within the legal and geographic competence of the authority. Reasonable alternatives must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.
- 1.17 Four Strategic Options for Built-up Area Boundary definition were developed, which considered a range of differing ways to define boundaries that would accommodate higher or lower levels of development depending on the degree to which houses, gardens, open spaces and other land that may have development potential is included

within boundaries, especially at the edges of the villages. Pedestrian accessibility also features in the options appraised.

- 1.18 Following on from these Strategic Options, an appraisal of the BUABs at each Village has been undertaken (with the exception of Lympstone where the BUAB is defined in the ‘made’ Neighbourhood Plan, and no changes are proposed to this through the Villages Plan). A detailed methodology for determining BUABs was applied to each Village, and a site by site analysis was undertaken which can be seen [here](#). This informed the reasonable alternatives for BUABs which were then subject to SA.
- 1.19 Given the above discussion on reasonable alternatives and Strategic Options, the following Villages have larger areas of land that were considered as reasonable alternatives in the Consultation Draft Villages Plan: Beer, Clyst St Mary, Feniton, Newton Poppleford, Uplyme and West Hill. A site submitted at Feniton during consultation was also subject to SA as an alternative given its large scale.
- 1.20 The Strategic Options, alongside a detailed methodology and site by site analysis for boundary definition and SA of the BUABs, negates the need for detailed site by site or land area by land area Sustainability Appraisal at all Villages – such a detailed evaluation of every single plot or area of land through the SA would be disproportionate and not appropriate, for what is a strategic assessment.
- 1.21 Given that the Local Plan is comprehensive in its policy coverage, only five policies have been included in the Villages Plan – these provide an overarching approach to considering development proposals in the BUABs and Greendale/Hill Barton Business Parks; and town/village vitality policies at Beer and Colyton. Options to allow either further growth at the business parks, or a continued restrictive policy, were subject to SA.
- 1.22 The assessment of the effects of these options was carried out using each of the 20 objectives identified previously in paragraph 1.14. The following symbols are used for setting out findings against each objective.

**Table 2: Key to symbols and colour coding used in the SA of the Villages Plan**

<b>++</b>	The option is likely to have a <b>significant positive</b> impact on the SA objective(s).
<b>+</b>	The option is likely to have a <b>positive</b> impact on the SA objective(s).
<b>0</b>	The option is likely to have a <b>negligible or no impact</b> on the SA objective(s).
<b>-</b>	The option is likely to have a <b>negative</b> impact on the SA objective(s).
<b>--</b>	The option is likely to have a <b>significant negative</b> impact on the SA objective(s).
<b>?</b>	It is <b>uncertain</b> what effect the option will have on the SA objective(s), due to a lack of data.
<b>+ / -</b>	The option is likely to have a <b>mixture of positive and negative impacts</b> on the SA objective(s).

## **Stage C: Preparing the Sustainability Appraisal report**

- 1.23 The full SA report and this Non-Technical Summary describes the process that has been undertaken to date in carrying out the SA of the Villages Plan. It sets out the findings of the appraisal of options, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations where possible for ways that plan policy could be developed to reduce potential negative effects and maximise the benefits of the Plan.

## **Stage D: Consultation on the Draft Villages Plan and this SA report**

- 1.24 The 'publication' draft Villages Plan and SA Report was published for consultation from March – May 2017. As set out in the consultation statement,<sup>1</sup> no responses were submitted at this stage that required amendments to the SA Report.
- 1.25 Following discussion at the Examination hearing sessions, East Devon District Council is now inviting comments on the East Devon Villages Plan incorporating Main Modifications and the SA Report to which this non-technical summary relates. Both documents are being published on the Council's website for consultation from **18 December 2017 to 2 February 2018**.

## **Stage E: Monitoring implementation of the Draft Villages Plan**

- 1.26 Recommendations for monitoring the social, environmental and economic effects of implementing the Villages Plan are presented in **Chapter 6** of the full SA report and described later in this Non-Technical Summary.

## **Difficulties Encountered and Assumptions made**

- 1.27 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. The appraisal of policy options has been based on broad principles for defining where Built-up Area Boundaries and so the assessment has concentrated on the general scale of development that might come forward under differing options, and some of the potential impacts that might be subject to development under alternative approaches. The actual appraisal has not looked at all land areas on a site by site, field by field, house/dwelling by house/dwelling basis.
- 1.28 In respect of policies relating to loss of commercial and retail facilities in Beer and Colyton, a number of general assumptions have had to be made about the possible nature of impacts that may arise. It has not been possible and it would not be reasonable to look at specific sites or buildings and in practice there could be site specific matters that run counter to the general commentary provided. On this issue, however, there

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<sup>1</sup> East Devon Villages Plan – consultation statement (submission), June 2017, Appendix 2:  
<https://eastdevon.gov.uk/planning-libraries/villages-plan-examination-2017/vp07aconsultationstatement.pdf>



is/would be expected to be clauses or qualifying considerations in policy that would for example set out cases and circumstances where conversion or redevelopment, on balance, would be acceptable or reasonable.

- 1.29 It should be noted that Grade 3 agricultural land comprises both Grade 3a and Grade 3b agricultural land. Only Grade 3a agricultural land, which covers about 21% of England's farmland, falls into the classification of best and most versatile agricultural land. The breakdown between Grade 3a and Grade 3b agricultural land is not available for the Villages Plan area, and therefore under the precautionary principle it is assumed that Grade 3 land has the potential to be best and most versatile agricultural land.

## Policy Context

- 1.30 The Villages Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national legislation, guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. The full review of plans, policies and programmes can be seen in Appendix 3. Of most clear cut importance is that it implements policies of the adopted East Devon Local Plan - this is its remit with limited scope to deviate.
- 1.31 Given this limited scope, there are a comparatively small range of relevant plans, policies and programmes that shape the policy context in which the Villages Plan is being prepared.
- 1.32 At the international level, the SEA Directive and the Habitats Directive are particularly significant as they require SEA and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Villages Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated. The South East Devon European Site Mitigation Strategy focuses on the likelihood of significant effects to the nature conservation interest at Exe Estuary Special Protection Area (SPA), Dawlish Warren Special Area of Conservation (SAC) and the East Devon Pebblebed Heaths SAC/SPA, as a result of recreation arising from new residential development.
- 1.33 There are a wide range of other relevant EU Directives, such as the Water Framework Directive 2000, which seeks to protect inland surface waters, transitional waters, coastal waters and groundwaters, most of which have been transposed into UK law through national-level policy, and in particular the NPPF. At a more local level there is a South West River Basin Management Plan, a Flood Risk Management Plan and Devon County Council have produced a Local Flood Risk Management Strategy, alongside Sustainable Drainage Systems (SuDS) Guidance for new development across the County.

- 1.34 There is a management strategy for the East Devon Area of Outstanding Natural Beauty, which ‘washes over’ much or all of the settlements of Beer, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury and Uplyme. The Dorset and East Devon World Heritage site (WHS) includes the coast at Beer and the WHS Management Plan is therefore relevant. Conservation Area Appraisals are available for Beer, Broadclyst, Colyton, East Budleigh, Kilmington, Lymptone, Musbury, Sidbury, Whimple and Woodbury.
- 1.35 The Villages Plan must be consistent with the National Planning Policy Framework (NPPF) and its accompanying Planning Practice Guidance, and will also need to be in conformity with the adopted East Devon Local Plan. The Local Plan advises of the definition of Built-up Area Boundaries falling to the Villages Plan, but actually has the full suite of written policies that will be applicable to these boundaries. The Local Plan makes clear that although BUABs will be defined in the Villages Plan, they will not have land specifically allocated for development.

## Baseline Information

- 1.36 Baseline information provides the context for assessing the sustainability effects of proposals in the Villages Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes.
- 1.37 Housing and tourist accommodation developments in some parts of the East Devon will in combination have a detrimental impact on the Exe Estuary SPA and East Devon Pebblebed Heaths SAC. Mitigation is required in the form of suitable alternative natural greenspace (SANGS) from developments within 10 km of these European sites – the Villages that fall within 10 km of one or both sites are: Broadclyst, Clyst St Mary, East Budleigh, Feniton, Lymptone, Newton Poppleford, Sidbury, West Hill, Whimple, Woodbury. Development in Beer and Colyton, and possibly other villages, may affect the Beer Quarry and Caves SAC, particularly the commuting/foraging routes and bat sustenance zones. The River Axe SAC could also be subject to adverse impacts arising from development, along with several other Sites of Scientific Special Interest in proximity to the Villages
- 1.38 The population of the parishes in the Villages Plan vary from around 3,800 in Woodbury to 543 in Musbury. The population generally rose between the 2001 and 2011 census, with the highest growth rates being in Lymptone (+16.65%) and Uplyme (+10.01%). The only parishes to lose population over this period were Beer (-4.5%) and Musbury (-1.2%). The health of the human population is generally high, with 89% of the residents of Woodbury describing their health as good or very good in the 2011 census and the lowest figure being 77% in Sidbury (this does include the town of Sidmouth).
- 1.39 Areas of moderate or better agricultural land (Grade 3 or higher) are adjacent to all Villages, with excellent (Grade 1) land around Broadclyst, Clyst St Mary, East Budleigh, Feniton, Lymptone, and Newton Poppleford.

- 1.40 There are flood risk zones in all of the settlements covered by the Villages Plan except Feniton, although Feniton is affected by surface water flooding. In addition, Feniton and parts of Whimble are covered by 'critical drainage area'. All settlements will have some level of risk from surface water flooding and minor watercourses should be taken into account with any development through a robust drainage strategy that promotes sustainable drainage systems (SuDS). A significant number of water-bodies in East Devon are currently failing to meet the objective of the Water Framework Directive for Good Ecological Status, with the majority being considered as 'moderate'. The Villages of Newton Poppleford and East Budleigh overlay Source Protection Zones.
- 1.41 There are no air quality management areas in the Villages plan area. Climate change is likely to mean warmer, wetter winters; hotter, drier summers; and more frequent extreme weather events. This is likely to result in changes to some of the settlements concerned and the baseline data will need to be reviewed through plan monitoring to ensure that they adapt and can remain sustainable. All of the settlements currently have sufficient material assets, in the form of local services and facilities, to meet the day to day needs of residents, although some settlements have many more than others, notably Beer and Colyton.
- 1.42 Beer, Broadclyst, Colyton, East Budleigh, Kilmington, Musbury, Sidbury, Whimble and Woodbury have conservation areas. There are around 650 Listed Buildings in the parishes covered by the settlements involved, although this includes buildings outside of the Villages Plan area. The largest concentration of Listed Buildings is within the historic core of Colyton with notable concentrations in the historic cores of Broadclyst, East Budleigh, Sidbury, Whimble and Woodbury. No historic assets within the settlement boundaries are on the Historic England 'Heritage at Risk' register (although this only includes Grade I and Grade II\* Listed Buildings and Grade II Places of Worship).
- 1.43 The villages of Beer, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury and Uplyme are within Areas of Outstanding Natural Beauty where the need to protect the landscape is a particularly important issue.
- 1.44 With regards to transport issues, car use for travelling to and from work is marginally higher in East Devon than the national average, and public transport use is significantly lower. Some of the Villages are accessed by remote lanes (e.g. Whimble, Feniton, Beer), whilst others are adjacent to main 'A' roads (Clyst St Mary, Musbury, Sidbury). There is a 1-2 hourly bus service from most of the Villages to larger settlements where a greater range of jobs, services, and facilities can be accessed. Feniton and Whimble have train stations on the Exeter – Waterloo line.

## Key Sustainability Issues

- 1.45 The key sustainability issues for the Villages Plan are presented in Table 3 below with commentary, in the second column, provided on the likely or possible outcomes in the absence of the Villages Plan.

**Table 3: Key Sustainability Issues and Likely Evolution without the Villages Plan**

Key Sustainability Issue	Likely evolution without the Villages Plan
<p><b>Biodiversity, geodiversity and flora and fauna -</b></p> <p>Specifically focussing on the importance of protecting wildlife and habitats (in particular the Exe Estuary SPA, East Devon Pebblebed Heaths SAC, Beer Quarry and Caves SAC, River Axe SAC).</p>	<p>Without the Villages Plan, and the clarity it provides over areas that in principle are suited to development, there would be a real concern that negative impacts could arise. Whilst sites with statutory protection are afforded strong Local Plan protection many other sites that are still of value could be vulnerable to loss or damage from development.</p> <p>The ability to define a policy boundary, rather than responding to applications in the absence of a boundary, provides scope to take into account relevant wildlife sites and features in boundary definition.</p>
<p><b>Population –</b></p> <p>Noting past modest population increase for most villages, although there was a 4.5% decline in Beer’s population which may be due to increased use of the housing stock by second home owners/as holiday lets. Higher than average elderly population.</p> <p>High house prices in proportion to wages and lack of affordable housing</p>	<p>The absence of the Villages Plan could lead to population decline due to the restrictive nature of Local Plan policies for proposals in the countryside. Lack of additional housing provision could increase house prices and exacerbate the ageing population profile in Villages as young people move elsewhere to find work/more affordable home. The provision of boundaries in the plan provides a policy tool that, to some degree, manages scales of housing growth and therefore informs possible future population levels. However on the issue of holiday/second homes the boundaries will have lesser impact; other factors (many outside of the control of planning) will be the key determinants.</p>
<p><b>Human health –</b></p> <p>In the villages health levels tends to be better than in the nearby towns and the baseline data gives no grounds for concern on this issue.</p>	<p>It is not envisaged that the presence or absence of the Villages Plan, and Built-up Area Boundary definition, would have significant overall impacts on health levels. Therefore, the trend for relatively better health in villages is likely to continue.</p>
<p><b>Soil –</b></p> <p>Potential loss of farmland is seen as the key concern.</p>	<p>The restrictions provided by Local Plan policies relating to development in the countryside should limit the loss of farmland around Villages.</p>
<p><b>Water and climate change factors –</b> Water quality issues and potential for flooding are relevant to some villages.</p>	<p>The risk of flooding is likely to increase due to climate change. Although additional development is likely to be limited, a potential concern could be the downstream impacts on flowing of surface water run-off generated from ad-hoc development not served by technically robust SuDS.</p>
<p><b>Air –</b></p> <p>Air quality concerns (with possible very limited localised exceptions) are not seen as a significant factor at villages.</p>	<p>The only potential for significant change, in the absence of a Villages Plan, is if large scale or clearly polluting developments were to come forward. Given general Local plan policy (and more wide spread protection) this is unlikely at the villages, so air quality concerns are unlikely to occur.</p>

Key Sustainability Issue	Likely evolution without the Villages Plan
<p><b>Material assets –</b> In more remote rural areas, including the Villages, geographical isolation is a key contributing factor to deprivation. Maintaining and enhancing services and facilities such as shops and medical facilities is seen as the key consideration.</p>	<p>Restrictions on development in the countryside may make it more difficult to support services and facilities in the Villages, particularly with the absence of a policy that could otherwise seek to resist loss of such facilities in the largest villages.</p>
<p><b>Cultural heritage including architectural and archaeological heritage –</b> Specifically noting concerns around possible adverse impacts on built heritage assets.</p>	<p>The NPPF and Local Plan policies should continue to preserve and enhance heritage assets. The Villages Plan can ensure these assets are taken into account when defining Built-up Area Boundaries.</p>
<p><b>Landscape –</b> All of the villages are flanked by attractive landscapes and a large number are located in the East Devon AONB where national and local plan policies apply.</p>	<p>NPPF and Local Plan policies should continue to preserve and enhance the landscape, but the Villages Plan can ensure this is considered in defining Built-up Area Boundaries.</p>
<p><b>Transport –</b> Levels of private car use are high and levels of public transport are significantly lower than the national average.</p>	<p>Ongoing poor provision and use of public transport may cause the Villages to become increasingly isolated in terms of access to jobs, services and facilities. The Villages Plan can mitigate this impact by considering access to services and facilities when defining Built-up Area Boundaries.</p>
<p><b>Economic growth -</b> High proportion of employment opportunities in tourism; and many better paid residents commute elsewhere to work, particularly to Exeter</p>	<p>Tourism is likely to remain a key employer, which may leave parts of the district vulnerable to any structural changes in the economy.  Limited employment opportunities would mean that commuting is likely to remain high, with associated issues of traffic congestion and air pollution.</p>

## Reasonable Alternatives

### Background

- 1.46 The adopted Local Plan advises that Built-up Area Boundaries will be defined for 15 key villages through the Villages Plan, though they will not have land specifically allocated for

development. This, alongside the other plans and policies, provides the context for considering “reasonable alternatives”.

## Strategic Options

1.47 SA of the Villages Plan has initially considered four ‘strategic’ options for Built-up Area Boundary definition for the East Devon villages, which set out an overall approach for identifying BUABs across all Villages. The four Strategic Options are:

- Option 1 – Use the existing core built form to define boundaries.
- Option 2 – Apply Option 1 but as an additional variant to also look at pedestrian accessibility to facilities.
- Option 3 – Draw boundaries more tightly than the core built form with the explicit intent to reduce levels of development.
- Option 4 – Draw boundaries that are larger than the core built form to accommodate more village development.

1.48 Overall, Option 2 performed best in the SA, and is taken forward as the preferred option. Option 2 seeks to accommodate new development, specifically new housing, in locations that respect the core built form, minimising adverse impacts upon landscape character. This option ensures facilities and services are accessible by pedestrians and, as such, has significant positive benefits in respect of access to facilities, and health. Encouraging non-car based mode of travel also scores a significant positive.

1.49 Option 1 performs similarly to Option 2, but is not taken forward as it does not incorporate consideration of accessibility to services. Option 3 is not preferred as it would limit housing supply (compared to the other options), and have ensuing negative social and economic impacts. Option 4 scores more positively on terms of housing delivery, but is not preferred due to adverse environmental effects, such as upon landscape character, biodiversity, and through encouraging greater car use.

1.50 The following table provides a summary of the SA scores of the four Strategic Options.

**Table 4: Summary of SA scores for the Strategic Options**

SA obj.	Option 1 – Core features to define boundary	Option 2 – Core features plus Pedestrian accessibility	Option 3 - Tighter Boundaries	Option 4 – Larger Boundaries
1: Homes	+	+	-	++
2: Services	+	++	+	-
3: Education	0	0	0	0
4: Health	+	++	+	-
5: Crime	0	0	0	0
6: Noise	0	0	0	0
7: Culture	0	0	0	0
8: Heritage	0	0	0	0
9: Landscape	0	+	+	--

10: Amenity	0	0	0	0
11: Biodiversity	-	-	0	--
12: Transport	0	++	+	--
13: Air, soil, water	0	0	0	0
14: Climate	-	0	0	-
15: Flooding	0	0	0	0
16: Energy	0	0	0	0
17: Waste	0	0	0	0
18: Employment	0	0	-	+
19: Vitality	+	+	0	+
20: Investment	0	0	-	+

- 1.51 Several options were rejected as they were not “reasonable alternatives”, including a criteria-based approach rather than identifying BUABs, and do nothing. Both of these would be contrary to the adopted Local Plan so were not taken forward.

## Village Built-up Area Boundary Options

- 1.52 The establishment of the Strategic Options described above, alongside an accompanying [criteria-based methodology for BUAB definition at each Village](#), negates the need for an SA of (potentially numerous) minor BUAB options – such detailed SA would be disproportionate, given the strategic nature of Sustainability Appraisals. The preferred Strategic Option (2) means that alternatives that are outside the core built form and beyond pedestrian accessibility can generally be excluded.
- 1.53 The Consultation Draft Villages Plan (August 2016) included reasonable alternatives for seven of the Village BUABs (Beer, Clyst St Mary, Feniton, Musbury, Newton Poppleford, Uplyme, West Hill), informed by the criteria assessment described above and other factors such as walking distances.
- 1.54 Many small-scale suggestions were made in consultation on the Draft to amend the BUABs at the Villages. These are not a different way of fulfilling the objectives of the plan, and are not sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made; therefore they do not constitute “reasonable alternatives”. The exception is a site put forward for inclusion to the north west of Feniton BUAB, comprising some 31 hectares of land – this has been subject to SA given its large scale and different sustainability implications. Several other relatively large sites were also suggested (e.g. 7-8ha site in West Hill; site with potential for 83 dwellings, land east of Feniton), but these would not be consistent with preferred Strategic Option (2) highlighted above.
- 1.55 During the Examination of the Villages Plan, the Inspector considered that a policy should be introduced to the Villages Plan that links the Built-up Area Boundaries shown on the inset maps to the adopted Local Plan policies. This is a specific policy requested by the Inspector to make the plan ‘sound’, and there are no ‘reasonable alternatives’ to the policy (VP01) that would achieve this outcome. As explained above, the strategic approach to BUABs and their specific delineation at the Villages have considered reasonable alternatives, and the sustainability findings of policy VP01 itself are explained below.

## **Beer**

- 1.56 An alternative approach excludes an area in the western part of the Village from the BUAB. The significant effects of this alternative are likely to be the same as for the preferred BUAB as this area is relatively small, still within reasonable walking distance of the village centre (albeit there is a steep gradient which may deter some pedestrians/cyclists), and there are no additional environmental effects. This alternative was not preferred because of a desire to include the built form, and there was no significant reason not to do so. Therefore, the preferred approach is to include this alternative area of land in the western part of the village.
- 1.57 Through consultation (August-September 2016) additional sites were suggested for inclusion in the BUAB on the periphery of Beer. These have been included where consistent with the assessment methodology (built-out sites related to the settlement). Suggested sites that were not consistent with the methodology and so were excluded consisted of built-out sites granted as an exception and a greenfield site which did not reflect the core built form. Therefore, the application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

## **Clyst St Mary**

- 1.58 Due to walking distances to community facilities in the village core of beyond 1km, an alternative to exclude the Local Plan allocated site at Winslade Park was considered. However, the flat topography and presence of pedestrian footpaths mean that it would still be reasonable to walk from Winslade Park, and the significant effects of this alternative are considered to be the same as the preferred BUAB.
- 1.59 In consultation on the Draft, a suggestion was made to include a dwelling and a garden on the northern edge of the village, but the garden is excluded as it could extend the built form of the settlement. St Bridgets Nursery continues to be excluded as it is detached from the settlement. Land at Winslade Park is included where it is in the Local Plan allocation, but recreation areas and land outside the existing built form are excluded. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

## **Feniton**

- 1.60 An alternative approach to include a BUAB around the 'old' village (in addition to the new village) was considered. This option is less favourable due to a lack of community facilities on the old village, poor pedestrian links to the facilities and train station in the new village, and the presence of designated heritage assets in the old village, which has around 15 Grade II listed buildings in and around the village core, and one listed as Grade II\*. In all other aspects, the significant effects would be the same as the preferred BUAB.



- 1.61 In consultation on the Draft, a large area of land (31 ha<sup>2</sup>) to the north west of the village (land around Sherwood Cross) was suggested for inclusion in the BUAB. Although this was excluded according to the site assessment criteria as being outside the core built form, given the large scale of the site the sustainability implications are different and it has been subject to SA as an alternative. The SA matrix (Appendix 4) for this alternative shows significant positive effects on housing delivery, but negative environmental effects relating to the historic environment, landscape character, loss of Greenfield and best and most versatile agricultural land, greenhouse gas emissions, and not matching the level of jobs with the economically active workforce. For these reasons, this alternative is not preferred.
- 1.62 A small area of land north of Acland Park was suggested for inclusion as it benefitted from planning permission, and it was agreed to include in the BUAB. Land to the east (including land east of Wainhomes development) was excluded as it is detached from the village and does not reflect the core built form.

### **Musbury**

- 1.63 An area of land including farm buildings at Baxter's Farm, adjoining the south west part of the village, was excluded in the Consultation Draft but was a reasonable alternative to consider. Following consideration of consultation responses, this land has been included as it reflects the built form of the settlement. Land at Mountfield is included in the BUAB despite consultation responses to the contrary, albeit support from the land owner, as it is within the built form. The inclusion of both of these sites in the BUAB has positive SA effects through ensuring new development will be within reasonable walking distance of services in Musbury, allowing small-scale housing to come forward which could support the primary school and other community services. There is potential for some negative effects on noise (presence of traffic along the A358), heritage assets in the village, landscape (located in the East Devon AONB), and biodiversity (River Axe SAC within 1km).
- 1.64 Consultation responses suggested land to the north, but this is excluded as being recreation space and outside the built form. Drakes Farm is excluded as it is detached from the village. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

### **Newton Poppleford**

- 1.65 An alternative BUAB was considered that includes parts of the village to the west of the A3052/B3178 roundabout. This option performs less well for objectives relating to access to community facilities by non-car modes, as it is beyond desirable walking distance and due to the lack of appropriate pedestrian footpaths. It would also bring the BUAB closer to the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, to

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<sup>2</sup> This site could potentially accommodate around 540 dwellings, assuming a net developable area of 60% (advocated in SHLAA methodology).

within approximately 200m, so adverse biodiversity impacts are more likely. In all other aspects, the significant effects would be the same as the preferred BUAB.

- 1.66 Consultation responses suggested sites to the west of the village for inclusion in the BUAB, but these are not included for the reasons highlighted above. Sites were also suggested on land north of the buildings along the A3052, but excluded because it is not within the core built form. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

## **Uplyme**

- 1.67 An alternative approach excludes an area to the south of the village from the BUAB. The significant effects of this alternative are likely to be the same as for the preferred BUAB as this area is relatively small, still within reasonable walking distance of community services in the village centre (albeit there is a steep gradient which may deter some pedestrians/cyclists), and there are no environmental effects in addition to potential impacts upon the East Devon AONB, and biodiversity (Sidmouth to West Bay SAC). This alternative to exclude an area to the south was not preferred because of a desire to include the built form, and there was no significant reason not to do so. Therefore, the area to the south is included in the BUAB.
- 1.68 Following consultation on the draft, some additions to the BUAB were made to include land adjoining to the north west and north east, along with several other smaller amendments in other parts of the BUAB. However, none of these changes were significant enough to justify a separate SA – the effects are the same as identified for the preferred BUAB.
- 1.69 Suggestions to include the camping site at Hook Farm were not pursued as the site is outside the built form. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

## **West Hill**

- 1.70 An alternative BUAB to include all of the 'built form' of West Hill was considered, which included land to the south of the preferred BUAB. This alternative was not preferred due to longer walking distances, along lengths of road with no footpath, which would discourage pedestrians from accessing services that lie to the north of the village. It would also bring the BUAB closer to the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, to within approximately 500m, so adverse biodiversity impacts are more likely. A County Wildlife Site would also be adjacent to the south east. For these reasons, this alternative was not preferred. In all other aspects, the significant effects would be the same as the preferred BUAB.
- 1.71 Further sites on the edge of West Hill were put forward for inclusion in the BUAB through consultation responses, but not incorporated as being outside the core built form of the village or could lead to extending the built form into large curtilages. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

## Other Villages

- 1.72 In **Lympstone**, at the time of 'publication' of the Villages Plan, the BUAB was already defined in the 'made' Neighbourhood Plan, and it was not considered appropriate to amend this given that it is broadly consistent with the methodology for boundary definition, and the Governments' Planning Practice Guidance advocating that made neighbourhood plans should be taken into account when preparing the Local Plan policies and should avoid duplicating neighbourhood plan policies.
- 1.73 No reasonable alternatives were identified for the other Villages in the Consultation Draft Villages Plan (August 2016), although additional sites were suggested for inclusion/exclusion in consultation responses. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA, as discussed below.
- 1.74 Additional sites were put forward in the BUAB at **Broadclyst**, but these were not included as they did not reflect the existing core built form. Recently constructed classrooms at the community college were included as it is related to the settlement, whilst an area to the front of the primary school was excluded as it forms an open space. An orchard was excluded as being a recreation space.
- 1.75 At **Colyton**, the former 'Ceramec' site was suggested for inclusion in the BUAB during consultation, and this was agreed as it is well related to the settlement. A small area of employment land has been included as it reflects the core built form, whilst suggestions for large tracts of Greenfield land to the north east, east, west, and south west were excluded due to their isolated location, outside the built form.
- 1.76 Sites were put forward to the south east of **East Budleigh** BUAB, but excluded as it is divorced from the core built form. The same issues arose from a site to the south.
- 1.77 In **Kilmington**, a site suggested for inclusion in the BUAB to the north west was excluded as being outside the core of the village and within large residential gardens. An area of land to the rear of the Old Inn was also excluded as not within the core built form, whilst a paddock on Whitford Road was mostly included as it was surrounded on most sides by the core built form.
- 1.78 A site to the south of **Sidbury** BUAB was submitted during consultation, but excluded as being divorced from the built form.
- 1.79 A consultation response to include the allotments in the BUAB at **Whimble** was not taken forward as it is outside the built form and amenity space. Two fields to the south east are excluded as outside the built form, as is a long strip of land extending from the south.
- 1.80 In **Woodbury**, sites around the BUAB were suggested through consultation, the largest being land at Gillbrook to the south that could accommodate around 25 dwellings, but excluded as being outside the built form.
- 1.81 In addition, consultation responses advocated further growth at **Greendale and Hill Barton Business Parks**, as the Villages Plan only identified the extent of authorised

business uses. These sites are not within the BUAB (contrary to Local Plan Strategy 6) and Local Plan Policy E7 Extensions to Existing Employment Sites does not apply at these two sites; therefore further growth would not be fully consistent with the adopted Local Plan. Despite this, given the consultation responses and national policy<sup>3</sup> that places significant weight on the need to support economic growth through the planning system, growth at these two business parks is considered a reasonable alternative to appraise.

- 1.82 Overall, the option not to identify BUABs allowing expansion at Greendale and Hill Barton Business Parks performs better in the SA, as this would lead to negative impacts upon landscape character, local environment, biodiversity, and greenhouse gas emissions, in identifying BUABs, largely due to their rural location. The location also means significant negative effects would arise from the objective to promote non-car modes of travel. This is reflected in the approach set out in policies VP04 and VP05 – the sustainability findings of these policies are discussed later in this NTS.

### **Village/Town Centre vitality Policies at Beer and Colyton**

- 1.83 In addition to defining Built-up Area Boundaries, the Villages Plan also includes policies to resist the loss of shops and commercial premises in the centres of Beer and Colyton, given the scale and importance of these centres. These are the largest settlements covered by the Villages Plan and both have core commercial centres that offer a good range of services and shops, their commercial centres are far more significant than all other villages.
- 1.84 SA work has considered the issues surrounding the option for inclusion of specific policy for these villages that protects core areas of shops and commercial activity versus not having policy and instead relying on general criteria based policy in the adopted Local Plan only. For many of the SA Objectives there are no really significant discernible differences between having a commercial /shopping protection policy. Where a resisting loss policy does have greatest absolute and comparative benefit is in respect of objectives to include:
- Promoting economic vitality (notwithstanding the fact that jobs in building and construction are provided in conversion and redevelopment) (SA objective 18).
  - Encouraging pedestrian accessibility to facilities (objective 12);
  - Promoting social and education activities, through resisting loss of facilities (objective 2); and
  - Affording protection to the build environment (objective 10).
- 1.85 For these reasons, the option to define a boundary/area to resist the loss of main town centre uses performs best in the SA and is the recommended preferred option. This approach is reflected in policies VP02 and VP03.

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<sup>3</sup> National Planning Policy Framework paragraph 19.

## Likely Significant Effects of the Villages Plan

1.86 Policy VP01 in the Villages Plan re-states the settlements in Strategy 27, and explains how development proposals relating to the BUABs will be considered. The detailed matrices of the BUABs at each Village can be found in Appendix 4 of the full SA report, whilst the scores are summarised in table 5 below.

**Table 5: Summary of SA scores for policies VP01-05 and the Village BUABs**

SA obj.	Policy VP01	Beer	Broadclyst	Clyst St Mary	Colyton	E. Budleigh	Feniton	Kilmington	Musbury	Newton Ponleford	Sidbury	Uplyme	West Hill	Whimble	Woodbury	Policy VP02	Policy VP03	Policy VP04	Policy VP05
1: Homes	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0
2: Services	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
3: Education	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0
	?	?	+	?			?	?			?	?	?	?					
4: Health	+	+	+	0	+	0	0	0	0	+	0	0	0	+	+	+	+	0	0
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0
	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?				
7: Culture	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
																+	+		
8: Heritage	-	-	0	0	-	-	0	-	-	-	-	0	0	-	-	+	+	0	0
	?	?	?		?	?		?	?	?	?	?		?	?				
9: Landscape	0	+/	+	0	+/	+/	+	+/	+/	+	+/	+/	+	+	+	0	0	+	+
	?	-	?	?	-	-	?	-	-	/-	-	-	?	?	?				
		?			?	?		?	?	?	?	?							
10: Amenity	-	0	0	-	0	0	0	0	0	0	0	0	0	0	-	+	+	+	+
	?	?	?		?	?	?	?	?	?	?	?	?	?					
11: Biodiversity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	+	+
12: Transport	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
13: Air, soil, water	0	+	+	-	-	+	+	-	-	+	+	+	+	+	+	0	0	+	+
					?			?	?										
14: Climate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

15:Flooding	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	+	+
16: Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0
18: Employment	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0
19: Vitality	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
20: Investment	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	+	+	-	-

- 1.87 There are long-term, permanent positive effects from policy VP01 and in identifying the Village BUABs on ensuring that everybody has the **opportunity to live in a decent home** (SA objective 1), through providing a degree of certainty that residential development will be acceptable, in principle, within the BUAB.
- 1.88 The methodology that has been used to delineate the BUABs provides the opportunity to **access community services** (objective 2), by considering reasonable walking distances to such facilities. By definition, the Villages have a range of community services to meet day-to-day needs, although the range is greater at some (e.g. Colyton, Beer). A long term, permanent positive effect is given for policy VP01 and all of the villages. Policies VP02 and VP03 resist the loss of main town centre uses in Beer and Colyton centres, and therefore have a significant, long-term positive effect.
- 1.89 A positive effect with some uncertainty is present with regards to **provide for education** (objective 3), where the number on the school roll is approaching or exceeding capacity. A significant positive effect (with uncertainty) is given for Broadclyst BUAB due to the presence of primary and secondary schools, ensuring access to education for children of all ages. Policy VP01 and BUABs at the other villages have a positive effect as all contain a primary school with capacity.
- 1.90 Policy VP01 and those villages that contain health care facilities (e.g. doctor’s surgery, pharmacy, dentist) are given a positive effect for the objective to **improve the population’s health** (objective 4), namely Beer, Broadclyst, Colyton, Newton Poppleford, Whimble, and Woodbury. The delineation of the BUABs ensures that new development should be within reasonable walking distance to these facilities – such activity can help to improve the population’s health. In addition, NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. Positive effects are also given for policies VP02 and VP03 as health centres constitute a main town centre use, and retaining the range of uses in the village centre provides walking/cycling access, promoting healthy travel.

- 1.91 None of the Village BUABs are considered likely to have an effect on the objective (5) to **reduce crime and fear of crime**. This issue will be more appropriately addressed by the design of new developments, which is outside of the scope of the Villages Plan.
- 1.92 A cumulative negative, albeit uncertain, effect is identified for policy VP01 and at all villages for **noise pollution** (objective 6), as new development can increase noise, particularly during construction and also from an increase in vehicular traffic. It is noted that some villages are located on main roads that already provide a degree of noise pollution (Clyst St Mary, Kilmington, Musbury, Newton Poppleford, Sidbury, Woodbury).
- 1.93 Policy VP01 and all of the Village BUABs are seen as having positive effects in relation to **maintaining and improving cultural, social and leisure provision** (objective 7) given the range of such facilities to meet day-to-day needs of residents. Beer's attraction as a tourist destination means it has a variety of cultural facilities such as art galleries and a Heritage Centre. Policies VP02 and VP03 resist the loss of main town centre uses in Beer and Colyton centres, and therefore have a significant, long-term positive effect.
- 1.94 Negative effects (with some uncertainty) upon the **historic environment** (objective 8) are likely at several Villages, specifically where heritage assets such as Conservation Areas and listed buildings are present – these are Beer, Colyton, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury, Whimble, and Woodbury. Policies VP02 and VP03 are positive as they specifically resist changes of use that could impact upon the character of the centre.
- 1.95 The delineation of BUABs to incorporate core built form should ensure the **wise use of land** (objective 9) although, by their nature, the Village BUABs are located in rural areas where it is important to **protect and enhance landscape character** (objective 9) is important. There is some uncertainty on this issue depending upon further site-specific detail, but the appraisal sets out a mix of positive effects for the wise use of land, and negative effects for those villages that are affected by AONB e.g. Beer, Colyton, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury, and Uplyme.
- 1.96 A negligible, uncertain effect is considered likely on **local amenity** issues (objective 10), apart from where busy roads dissect a village (Clyst St Mary, Woodbury) where identifying the BUAB is seen as negative. Policies VP02 and VP03 are positive as they specifically resist changes of use that could impact upon the character of the centre.
- 1.97 **To conserve and enhance biodiversity/geodiversity** (objective 11) is an important issue at all Village BUABs, with most being within 10km of European protected sites, and a range of SSSIs and County Wildlife Sites present across rural areas. Although mitigation will minimise the impact, a minor negative effect is likely for policy VP01 and at all villages.
- 1.98 **Non-car based modes of transport and reduced journey lengths** (objective 12) are promoted through the use of reasonable walking distances to community services as a key determinant for the BUABs. Therefore, positive effects are considered for policy VP01 and all Villages BUABs, noting that availability of public transport varies amongst

them e.g. Feniton and Whimble have train stations but a poor bus service, whilst Clyst St Mary has three buses per hour to Exeter City Centre. Topography, lack of footpaths, and car traffic may deter walkers/cyclists in some villages e.g. Beer, Uplyme, West Hill. Resisting the loss of main town centre uses means that policies VP02 and VP03 are also likely to have a positive effect, as it will ensure facilities remain accessible to non-car based modes.

- 1.99 Positive effects are likely for most villages for **maintaining and enhancing air, soil and water quality**, (objective 13) apart from Clyst St Mary which includes a Greenfield site of partly Grade 1 agricultural land. Negative uncertain effects are identified at Colyton, Kilmington and Musbury where the proximity of the BUAB to the River Axe SAC could potentially affect water quality. These effects counterbalance each other to a degree, meaning a negligible effect overall for policy VP01.
- 1.100 **A reduction in local emissions of greenhouse gases and increased capacity to adapt to climate change** (objective 14) may not occur through additional development in the BUABs, although any built development is likely to be small scale and emissions from travel should be minimised due to the presence of services and facilities. The incorporation of mitigation required in the NPPF and Local Plan policies to adapt to climate change (e.g. designed to cope with hotter, drier summers; warmer, wetter winters; and more extreme weather events) should ensure a negligible effect overall for policy VP01 and at all Village BUABs.
- 1.101 There are areas of medium-high **flood risk** (objective 15) within or in close proximity to all of the Village BUABs, apart from Feniton, although this village has been affected by surface water flooding. The implementation of NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale, potentially re-using existing buildings, meaning that additional impermeable surfaces will be limited. This means that overall a negligible effect has been given for policy VP01 and all Villages, with some uncertainty depending upon specific location and design of new development.
- 1.102 Negligible effects are likely on **efficient energy consumption** (objective 16), as this issue will be more appropriately addressed by the design of new developments, which is outside of the scope of the Villages Plan. The re-use of buildings and brownfield sites should mean positive effects upon **waste resources** (objective 17).
- 1.103 Policy VP01 and the Village BUABs should have minimal effects upon **maintaining sustainable growth of employment** (objective 18). Although out-commuting from new residents may be likely due to a relative lack of job opportunities at the Villages, new development would be limited apart from at Clyst St Mary where the boundary encompasses two large housing sites and therefore a negative effect is considered. Resisting the loss of main town centre uses means that policies VP02 and VP03 are also likely to have a positive effect
- 5.1 The identification of Village BUABs provides the opportunity for new development to **enhance the vitality and viability** (objective 19) of the villages, and the Beer and



Colyton vitality policies (VP02, VP03) are significantly positive for this objective. **Indigenous and inward investment** (objective 20) should be particularly encouraged at Beer through its attraction for tourism, and Colyton due to its relatively greater range of services and businesses. Resisting the loss of main town centre uses means that policies VP02 and VP03 are also likely to have a positive effect. Elsewhere, there are generally neutral/negligible effects for encouraging inward investment, apart from the Greendale/Hill Barton policies (VP04, VP05) where a negative effect is likely through a continuation of the restrictive Local Plan policy approach.

## Recommendations – Mitigation measures and Maximising the benefits of the Villages Plan

- 1.104 The negative effects identified in the SA mainly relate to the environmental effects of growth (particularly in relation to noise, heritage, biodiversity and possibly landscape), and the impacts of new housing and employment land within the BUABs, although these are likely to be minor given the likely small-scale of development.
- 1.105 The Villages Plan makes clear that it should be read in conjunction with the East Devon Local Plan (adopted January 2016). The adopted Plan includes a range of policies that will inform decisions made on development proposals at the BUABs, and within the identified centres at Beer and Colyton. This should reduce potential negative effects. Specific policies in the Local Plan that will mitigate environmental effects include:
- Strategy 46 – Landscape Conservation and Enhancement and AONBs
  - Strategy 47 – Nature Conservation and Geology
  - Strategy 48 – Local Distinctiveness in the Built Environment
  - Strategy 49 – The Historic Environment
  - Policies EN4 – EN10, and EN14 relating to biodiversity, heritage, and pollution, respectively.
- 1.106 In addition, proposals should be consistent with the National Planning Policy Framework, an important material consideration which provides further scope for reducing negative effects.
- 1.107 Due to the nature of the effects identified, and the existing policies in place to mitigate such effects, there are no recommendations for the Villages Plan.

## Monitoring

- 1.108 Government guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focussed on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where

monitoring would enable preventative or mitigation measures to be taken. Monitoring in respect of the Local Plan will also be of relevance to the Villages Plan and set out in this section of the report are key matters that will part overlap Local Plan monitoring but which are especially relevant to the Villages Plan.

1.109 The following **Table 6** presents suggested indicators for monitoring the potential significant sustainability effects of implementing the Villages Plan.

**Table 6: Suggested indicators for monitoring the sustainability effects of the Villages Plan**

SA Objectives for which potential effects have been identified	Suggested Indicators
1. To ensure everybody has the opportunity to live in a decent home.	<ul style="list-style-type: none"> <li>• Number of new homes built annually at each village – both inside and outside of boundaries.</li> <li>• Number and percentage of new homes built that are affordable.</li> </ul>
2. To ensure that all groups of the population have access to community services.	<ul style="list-style-type: none"> <li>• Number of residential completions in settlements covered by Villages Plan outside of the BUAB.</li> <li>• Number of new homes built that are within walking distance of basic village facilities.</li> </ul>
3. To provide for education, skills and lifelong learning	<ul style="list-style-type: none"> <li>• Number of state primary schools opened or closed in settlements with a BUAB.</li> <li>• Number of new school places created in the defined villages.</li> </ul>
4. To improve the population's health	<ul style="list-style-type: none"> <li>• There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on life expectancy in the District.</li> </ul>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	<ul style="list-style-type: none"> <li>• There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on number of noise pollution incidents reports annually.</li> </ul>
7. To maintain and improve cultural, social and leisure provision.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted that result in a net loss of cultural, social or leisure provision in settlements with a BUAB.</li> </ul>
8. To maintain and enhance the historic environment, heritage assets and their settings.	<ul style="list-style-type: none"> <li>• Net change in number of heritage assets on the 'Heritage at Risk Register' for settlements with a BUAB.</li> </ul>
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	<ul style="list-style-type: none"> <li>• Amount and percentage of new development at villages with a BUAB taking place on brownfield land.</li> </ul>

SA Objectives for which potential effects have been identified	Suggested Indicators
10. To maintain the local amenity, quality and character of the local environment.	<ul style="list-style-type: none"> <li>• There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on number of complaints made to EDDC regarding noise pollution.</li> </ul>
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	<ul style="list-style-type: none"> <li>• Number of designated sites 'lost' to development in villages with BUABs.</li> <li>• Number of dwellings granted permission that contribute to habitat mitigation programmes.</li> </ul>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	<ul style="list-style-type: none"> <li>• Levels and frequency of bus services in the District's villages.</li> </ul>
13. To maintain and enhance the environment in terms of air, soil and water quality, particularly in the River Axe which does not currently meet Water Framework Directive targets.	<ul style="list-style-type: none"> <li>• Number of declared Air Quality Management Areas (AQMAs) in villages.</li> </ul>
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	<ul style="list-style-type: none"> <li>• Renewable energy capacity installed by type in villages.</li> </ul>
15. To ensure that there is no increase in the risk of flooding as a result of development.	<ul style="list-style-type: none"> <li>• Number of planning permissions granted in settlements included in Villages Plan contrary to the advice of the Environment Agency or Devon County Council as Lead Local Flood Authority in relation to flood risk, surface water drainage or water quality.</li> </ul>
16. To ensure energy consumption is as efficient as possible.	<ul style="list-style-type: none"> <li>• Renewable energy capacity installed by type in villages.</li> </ul>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	<p>There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on</p> <ul style="list-style-type: none"> <li>• Volume of waste generated in the District annually.</li> <li>• Percentage of waste generated in the District that is recycled.</li> </ul>
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	<ul style="list-style-type: none"> <li>• Amount of land (defined by completed sqm gross floorspace) developed for employment by type in villages.</li> <li>• Amount of employment land lost to residential development in villages.</li> </ul>

SA Objectives for which potential effects have been identified	Suggested Indicators
19. To maintain and enhance the vitality and viability of Villages of East Devon.	<ul style="list-style-type: none"> <li>• Amount of completed retail development in villages.</li> </ul>
20. To encourage and accommodate both indigenous and inward investment.	<ul style="list-style-type: none"> <li>• Amount of land (defined by completed SqM gross floorspace) developed for employment by type in villages.</li> </ul>

## Conclusions

- 1.110 The SA has assessed the sustainability effects of the Villages Plan, within the context of the adopted Local Plan. Positive effects have been identified for the BUABs on social objectives for providing homes, ensuring access to community services, providing for education, and improving health; and maintaining/improving cultural, social and leisure provision, promoting non-car travel, and maintaining/enhancing vitality and viability.
- 1.111 Some negative effects have been identified, mainly relating to the environmental effects of growth, and the impacts of new housing and employment land within the BUABs. Although it should be noted that additional development that would be facilitated by identifying BUABs through the Villages Plan is likely to be small-scale.
- 1.112 The village centre vitality policies for Beer and Colyton result in significant positive effects on ensuring access to community services and supporting their vitality and viability.
- 1.113 Reasonable alternatives have also been subject to SA, and explanation is provided as to why the preferred option has been chosen. No mitigation measures were recommended, given the existing policy framework in the adopted Local Plan and the NPPF.

## Next steps

- 1.114 The Sustainability Appraisal Report and this non-technical summary will be made available alongside the East Devon Villages Plan Main Modifications during the consultation period from **18 December 2017 to 2 February 2018**.
- 1.115 Following this public consultation, the responses will be reviewed and addressed as appropriate. If no changes are considered necessary, this version of the SA Report non-technical summary will be published alongside the adopted Villages Plan. A sustainability appraisal 'adoption statement' will also be published at this stage that will explain how sustainability considerations have informed the Plan.