

Date: 25 June 2015
Contact number: 01395 572719
Email: efreeman@eastdevon.gov.uk
Direct Fax:
Reference: A/02/16/03



Mr A Thickett
East Devon Local Plan Inspector
c/o Programme Officer
East Devon District Council
Knowle
Sidmouth
EX10 8HL

East Devon District Council
Knowle, Sidmouth, EX10 8HL
DX 48705 Sidmouth
Tel: 01395 516551
Email: csc@eastdevon.gov.uk
www.facebook.com/eastdevon
www.twitter.com/eastdevon

Dear Mr Thickett

East Devon Local Plan – Representations made by Natural England (Representor Number 3743)

I write in respect of representations made by Natural England, see:

<http://eastdevon.gov.uk/planning-libraries/consultation-proposed-changes2015/3743-naturalenglandvarious.pdf>

<http://eastdevon.gov.uk/planning-libraries/consultation-proposed-changes2015/3743-naturalenglandsiteallo.pdf>

<http://eastdevon.gov.uk/planning-libraries/consultation-proposed-changes2015/3743-naturalenglandhousing.pdf>

<http://eastdevon.gov.uk/planning-libraries/consultation-proposed-changes2015/3743-naturalenglandletter.pdf>

Natural England have expressed concern in respect of matters relating to Habitat Regulation Assessment and Sustainability Appraisal, with these, amongst other matters, referencing to the proposed scale of housing development. As a means to seek to address the points raised by Natural England we have been in contact with them and also have discussed with our consultants who have assisted us on these work areas.

Habitat Regulations Assessment

In respect of concerns raised by Natural England regarding Habitat Regulations Assessment we have gone back to our consultants, Footprint Ecology, who have discussed directly with Natural England, and have produced the appended plan of further work. I would advise that we had been working on an assumption that existing proposed mitigation could be rolled out to address further growth. However, having reviewed the Natural England submission we would hope that the further proposed work should overcome concerns raised.

New assessment, assuming it concludes additional development can be mitigated, would require further consultation and any Main Modifications you may recommend could require assessment and presumably consultation in their own right. I would hope that relevant consultation on

East Devon – an outstanding place



assessment (and proposed mitigation) could run alongside any further consultation on any possible additional plan changes. In the first instance, however, I would wish to work on the basis that mitigation, in principle, will be appropriate and viable.

Sustainability Appraisal

In respect of concerns raised by Natural England regarding Sustainability Appraisal we have also taken further advice from our consultants leading on this work, LUC. Appended to this letter is a paper by LUC.

Whilst noting the concerns that Natural England raise we are satisfied at this stage that procedural matters in respect of plan appraisal have been appropriately followed, though we would ideally seek to discuss further with Natural England ahead of hearing sessions and could see good reason to seek to establish a Statement of Common Ground. It should be noted that all policy changes in the plan have been subject to appraisal and that in a sustainability report dated February 2015, produced by LUC, we did specifically consider the option of not planning to meet additional housing requirements. See paragraph 1.13 onward of PSD2015J Sustainability Appraisal Addendum for East Devon's Local Plan at:

<http://eastdevon.gov.uk/media/990764/sa-addendum-for-additional-options-feb-2015.pdf>

Representations Relating to Housing Growth and Distribution

Related to the above Natural England also raised wider concerns relating to the scale and distribution of residential development. In our evidence reports and papers submitted in response to your questions we have set out the Council case and evidence which I trust, you will find, will cover many of the matters raised by Natural England.

On the specific issue of housing development at villages we note that Natural England make specific comment on the failure of the Sustainability Appraisal to make use of landscape assessment evidence. This issue is addressed in the attached paper by LUC.

Yours sincerely

Ed Freeman
Service Lead – Planning Strategy and Development Management