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Dear Sir/Madam

### **SA/SEA Scoping for the Villages Plan DPD**

This letter is seeking your views on the scope of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) of the East Devon Villages Plan Development Plan Document (DPD), referred to in this letter as 'the Villages Plan', which is being produced by East Devon District Council. The Villages Plan will form part of the Development Plan for East Devon, along with the adopted Mineral and Waste Plans of Devon County Council, the adopted East Devon Local Plan, any further DPDs produced by the council and any 'made' Neighbourhood Plan (currently Lympstone Neighbourhood Plan). The Villages Plan will define 'Built-up Area Boundaries' around 15 of the larger villages/smaller towns of East Devon and include 'inset' plans for Greendale and Hill Barton Business Parks. It may also include specific land use policies for the relevant settlements.

In line with Government guidance<sup>1</sup>, an integrated SA and SEA process is being undertaken in relation to the Villages Plan. Therefore, throughout this letter the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Directive'.

Work on the Villages Plan commenced in 2012 and a draft plan was produced for consultation in January 2014 and is available to view at <http://eastdevon.gov.uk/media/266865/draft-villages-dpd.pdf>, together with the supporting SA/SEA at [Village document - Technical evidence - East Devon](#). This draft plan and the accompanying SA/SEA were developed within the context of the then emerging East Devon Local Plan. However, the strategic context of the local plan evolved during the local plan examination so that it is now appropriate to reconsider the scope of the Villages Plan and to update the SA work undertaken.

Scoping is the first stage in the SA process, with the purpose of setting the context and objectives, establishing the baseline and deciding on the scope of the SA. The tasks involved in the Scoping stage include:

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<sup>1</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

- Identifying other relevant policies, plans and programmes and sustainability objectives.
- Collating baseline information.
- Identifying sustainability issues and problems.
- Developing the SA framework
- Consulting on the scope of the SA.

### **Identifying other relevant policies, plans and programmes and sustainability objectives**

Given the narrow scope of the Villages Plan, plus the fact that a detailed SA scoping consultation has already been undertaken for the adopted East Devon Local Plan, instead of preparing a full Scoping Report we have set out the scope of the SA work for the Villages Plan in the form of this Scoping letter for consultation with the statutory environmental bodies. This letter seeks to meet the requirements of the SEA Regulations in relation to this DPD as efficiently as possible. The adopted East Devon Local Plan and relevant SA/SEA work is available at [Local Plan adoption - East Devon](#).

There are a wide range of relevant plans, policies and programmes that shape the policy context in which the Villages Plan is being prepared. These have been reviewed in detail as part of the SA of the East Devon Local Plan, and the most relevant issues for the Villages Plan specifically are summarised below.

The Villages Plan must be in line with national policy as set out in the **National Planning Policy Framework (NPPF)** and **National Planning Practice Guidance** and will also need to be in conformity with the adopted **East Devon Local Plan**. The Local Plan, at Strategy 27, states that Built-up Area Boundaries will be defined for the settlements of Beer; Broadclyst; Clyst St. Mary; Colyton; East Budleigh; Feniton; Kilmington; Lypstone; Musbury; Newton Poppleford; Sidbury; Uplyme; West Hill; Whimble and Woodbury through the East Devon Villages Plan, though they will not have land specifically allocated for development. The adoption of this policy clearly narrows the scope of the Villages Plan from that originally consulted on as the allocation of land for new development no longer fits with the strategic policies of the newly adopted Local Plan. The definition of Built-up Area Boundaries will influence the level of development likely to come forward as ‘windfalls’ in the settlements concerned.

The Villages Plan must also be in line with **European SEA Regulations**<sup>2</sup> and **Habitat Regulations**<sup>3</sup>, and this SA/SEA Scoping letter forms the first stage in meeting the SEA requirements.

The Habitats Regulations Assessment (HRA) work for the Local Plan has taken into account all of the proposed changes to the Local Plan as submitted in 2013, including the most recent proposed changes (August 2015). It concluded that, in light of the August 2015 proposed changes which reflect discussions between EDDC and Natural England, the Local Plan accords with the requirements of the Habitats Regulations, and parent European Directives, i.e. the implementation of the Plan would not have likely significant effects on the integrity of any of the European sites in and around East Devon. As the Villages Plan is not seeking to provide for residential development in excess of that provided for through Local Plan policy, it is considered unlikely to have additional significant effects, and mitigation measures included in the South East Devon European Site Mitigation Strategy<sup>4</sup> (see below) should help to reduce the likelihood of significant effects occurring from implementation of the Villages Plan.

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<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>3</sup> The Conservation of Habitats and Species Regulations 2010.

<sup>4</sup> South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014.

### **Collating baseline information**

Baseline information provides the context for assessing the sustainability 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. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends. Annex 1(f) of the SEA Directive requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

Baseline information for the whole of East Devon District has been collated and regularly updated throughout the SA of the East Devon Local Plan and has been consulted on as part of the SA process. Key baseline information about the settlements covered by the villages plan specifically is summarised below.

The Villages Plan will apply to geographically discrete areas of the District, but does not seek to promote development in addition to that set out in the adopted Local Plan. The definition of Built-up Area Boundaries will help to determine the scope to build 'infill' housing within the settlements concerned and different approaches could result in differing levels of development.

In partnership with Natural England, the Council and its neighbouring authorities of Exeter City Council and Teignbridge District Council have determined that housing and tourist accommodation developments in their areas will in combination have a detrimental impact on the Exe Estuary SPA and East Devon Pebblebed Heaths SAC through impacts from recreational use. The impacts are highest from developments within 10 km of these European sites, and, depending on the sites to be allocated, Villages sites may fall within 10 km of one or both. The three Councils have prepared the South East Devon European Site Mitigation Strategy<sup>2</sup> which sets out a joint approach to mitigating the potential significant effects on the SAC and SPA including delivery of suitable alternative natural greenspace (SANG) sites to try to encourage dog walking and other recreation away from the sensitive European sites. Some of the villages in the Villages Plan fall within the 10km buffer.

Some of the settlements in the Villages Plan are in the AONBs of East Devon and landscape impact may be an important consideration in the development of specific policies and the spatial extent of policy boundaries.

There are flood risk zones in some of the settlements covered by the Villages Plan that may be relevant to specific policies and the spatial extent of policy boundaries.

The quality of agricultural land around the settlements covered by the plan varies and the quality of agricultural land may affect the development of some policies, although the Villages Plan is not seeking to allocate sites for development.

There are heritage assets within the settlements covered by the Villages Plan and consideration will be given to the impact of any policies on the significance of these assets and their setting.

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There are no air quality management areas in the Villages plan area (within, adjoining or close to any of the villages that the plan will cover).

### **Identifying sustainability issues and problems**

Consideration of the policy context and baseline information enables the identification of key environmental and sustainability issues for the areas covered by the Villages Plan, which will need to be taken into account in the SA. These are largely similar to the key issues facing the wider District and include:

- The need to protect biodiversity (in particular the Exe Estuary SPA and East Devon Pebblebed Heaths SAC) from the impacts of large-scale development in the area, in particular increased recreation pressure.
- The need to consider the potential impact of development proposals on heritage assets and their setting.
- The need to avoid high levels of car use by balancing residential development with an appropriate range of employment opportunities, services and facilities.
- The need to consider any impact on Beer Caves or River Axe Special Areas of Conservation.

### **Developing the SA framework**

The development of a set of SA objectives is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared, with each proposal in the plan being scored against each SA objective. It is considered appropriate to make use of the SA framework that was used for the SA of the East Devon Local Plan as those objectives have been designed to address the key sustainability issues facing East Devon District, which are also relevant at the local level. The SA framework, which has been consulted on throughout the SA of the Local Plan, is presented in **Table 1**, which also notes which of the SEA topics each objective addresses.

All of the options for the Villages Plan, including any reasonable alternative options, will need to be subject to SA. The SA work for the Villages Plan will be undertaken in the context of the SA work that has already been undertaken in relation to the development of the adopted Local Plan. Each policy and/or reasonable alternative will be subject to SA using broadly the same methodology as was used for the SA of the Local Plan, i.e. setting out the assessment of each policy or site option in a matrix with a score and a brief justification for that score being given for each objective.

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**Table 1**

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

Once the SA matrices are finalised the findings will be compiled into a draft SA report. This will be structured so as to meet all of the requirements of Annex 1 of the SEA Directive, and will include:

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- 1 An outline of the contents of the Villages Plan and its relationship with other relevant plans, policies and programmes (including in particular its relationship with the adopted East Devon Local Plan).
- 2 The environmental, social and economic characteristics of the area covered, including any problems or issues and their likely evolution without the Villages Plan (in many cases the policies of the adopted Local Plan are likely to address the issues to some extent).
- 3 Key environmental, social and economic policy objectives set at the international, national and local level of relevance to the Villages Plan.
- 4 The SA framework being used for the SA of the Villages Plan.
- 5 The reasonable alternatives considered, including how they performed in sustainability terms and an outline of East Devon District Council's reasons for selecting particular options for inclusion in the Villages Plan.
- 6 Any difficulties encountered during the SA process, e.g. data limitations.
- 7 The significant effects of the Villages Plan on each of the SA objectives, taking into account mitigation (which may be provided by policies in the Villages Plan and adopted Local Plan).
- 8 A proposed monitoring framework for monitoring the significant effects identified (this is likely to link closely with the monitoring framework for the adopted Local Plan).
- 9 A Non-Technical Summary which summarises all of the above.

The SA report will also include an appendix setting out the Scoping consultation comments received and noting how each one has been addressed in the full SA report (e.g. any resulting amendments made to the SA objectives or baseline information).

### **Consulting on the scope of the SA**

The SEA Regulations require a local authority to consult the statutory environmental bodies (Historic England, the Environment Agency and Natural England) regarding the scope of an SA/SEA for a minimum of five weeks. We are now inviting comments on the scope of the SA as set out in this letter. In particular, the consultees are requested to consider:

- Whether there are any additional plans, policies or programmes that are particularly relevant to the SEA of the Villages Plan.
- Whether the baseline information provides a suitable baseline for the SEA of the emerging Villages Plan.
- Whether there are any additional key sustainability issues that should be included.
- Whether the SA framework is appropriate and includes a suitable range of objectives (note that the framework has already been consulted on in relation to the SA/SEA of the Local Plan).

The responses from this consultation will be reviewed and taken into account during the assessment of the Villages Plan against the SA objectives. The SA report will explain how any consultation responses have been addressed.

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Please return your comments to me by 27<sup>th</sup> April 2016, either to the address at the top of this letter or via email to the address above.

Yours faithfully

*LJ Renshaw*

Linda Renshaw  
Senior Planning Officer