

Mrs Linda Renshaw
East Devon District Council
The Knowle
Sidmouth
Devon
EX10 8HL

Our ref: DC/2006/000243/SE-
03/SP1-L01
Your ref:
Date: 27 April 2016

Dear Mrs Renshaw

**East Devon Villages Plan Development Plan Document (DPD)
Sustainability Appraisal/Strategic Environmental Assessment Scoping**

Thank you for your consultation of 16 March 2016 providing us with the opportunity to comment on the above.

The Sustainability Appraisal (SA) scoping letter identifies many of the most pertinent issues facing the district's villages. However, we consider that the scope of the SA needs to be widened to ensure all the relevant issues are covered. Our advice on the relevant plans, policies and programmes as well as the baseline, sustainability issues and the SA framework are set out below.

Relevant Policies, Plans and Programmes

We advise that the SA should include reference to and consideration of our emerging Flood Risk Management Plan (see the scoping document 'Managing the risk of flooding in the South West River Basin District'), the Local Flood Risk Management Strategy produced by Devon in their capacity as a Lead Local Flood Authority and the South West River Basin Management Plan.

Baseline and Sustainability Issues

In terms of the baseline information, the letter already acknowledges the importance of and pressures on the various conservation designations across the East Devon district as well as the significant flood risk constrains in many of the settlements.

Nonetheless, we advise that that the baseline should also include the objectives of the Water Framework Directive (WFD), such as ecological status, in the district's water-bodies. A great number of water-bodies in East Devon are presently failing to meet Good Ecological Status. It is the target that all water-bodies meet Good Ecological Status by 2027.

We also recommend that the SA consider the evolution of the baseline issues as a result of climate change over the plan period. An understanding of this will be crucial if the DPD is to help the villages adapt to climate change and remain sustainable in the future.

As for sustainability issues, we concur with the issues already included in the scope, especially the need to consider the impacts on the River Axe which is presently not meeting its WFD targets. However, we advise that further sustainability issues should be informed by the additional baseline issues recommended above.

SA Framework

The proposed SA Framework appears to be reasonable. However, whilst we welcome the framework objective 'to ensure that there is no increase in the risk of flooding' it is important to note that flood risks will increase over time as a result of climate change and therefore it might be an objective which is difficult to satisfy. It might therefore be better to amend the text to read: 'to ensure that there is no increase in the risk of flooding as a result of development'.

Furthermore, whilst we welcome the objective 'to contribute towards a reduction in local emissions of greenhouse gases' we consider that it would perhaps be prudent to also include an objective regarding the ability of the district's villages to adapt to the challenges posed by climate change.

Yours sincerely

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