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BY EMAIL ONLY

Dear Linda

Planning consultation: SA/SEA Scoping for the Villages Plan DPD

Location: East Devon

Thank you for your consultation on the above, dated 15 March 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

General comments

We welcome your letter which drafts the scope of the SA/SEA for the Villages Plan DPD. Determining the scope of the SA is an important step in ensuring that it will robustly assess the long term sustainability of the Plan. We welcome the integration of the requirements of the Environmental Assessment of Plan and Programmes Regulations 2004 into the SA process.

We appreciate that the SA/SEA scoping of the Villages Plan builds on the East Devon Local Plan SA/SEA. A clearer thread should however run through this scope, from plans and projects, baseline information, sustainability issues and problems, through to objectives and sustainability indicators.

The scoping letter refers to the definition of Built-up Area Boundaries and logically concludes that the definition of these boundaries will influence the level of development likely to come forward as windfalls in the relevant settlements. The letter also mentions that the plan may include land use policies for the relevant settlements. Without having sight of the criteria that will be used to define the new boundaries or the land use policies we must assume that a significant amount of development may come forward.

We appreciate that the Villages Plan can rely to some extent on the HRA of the Local Plan. However as significant development can potentially come forward as a result to the Villages Plan and, considering the proximity of some of the villages in the plan to the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, the Exe Estuary SPA, Beer Quarry & Caves SAC and River Axe SAC, we require that HRA scoping/screening of the plan is undertaken. The results from this work will need to feed into the scope of the SEA of the Villages Plan.

Our detailed comments

Other plans, policies or programmes:

The SE Devon European Site Mitigation Strategy, as adopted by EDDC, is most relevant to the Villages Plan. The AONB Management Plan also critically affects the scope and plan area of the Villages Plan. These documents and their key objectives need to be included as being amongst the



most relevant plans for the Villages Plan. The Dorset and East Devon World Heritage Site Management Plan too is relevant to the plan.

Baseline information:

As the East Devon Local Plan is very recent, it is reasonable to rely on (and extend as necessary) the baseline information for the East Devon Local Plan SEA. Baseline information which should be highlighted as part of this scoping document is Beer Quarry & Caves SAC and River Axe SAC. They are identified in the key sustainability issues and problems for this plan so they should also be identified in the baseline information. The existing information relating to bat sustenance zones and commuting/foraging routes around Beer Quarry Caves should feature also as this is relevant to the settlement boundaries of Beer and Colyton/Colyford.

The SSSIs near the villages under consideration in the plan should be specifically mentioned (information is available on our mapping service : <http://magic.defra.gov.uk/>)

Other baseline information which should be considered for inclusion is information about coastal change and water quality (such as for the Axe).

Identifying sustainability issues and problems:

The first key issue as listed is not complete and should be amended to read:

- The need to protect biodiversity and geodiversity (in particular the Exe Estuary SPA and East Devon Pebblebed Heaths SAC and East Devon Heaths SPA) from the impacts of large-scale all residential development in the area, in particular increased recreation pressure and increased bird predation from domestic cats.

We would recommend that the need to protect identified SSSIs is included either as a separate issue or as part of the first sustainability issue.

The last issue should be amended as follows:

- The need to ~~consider~~ avoid any adverse impact on Beer Quarry & Caves ~~or~~ and River Axe Special Areas of Conservation.

Considering that a number of villages fall partly or entirely within an AONB, an additional key issue should be included relating to the need to protect the landscape.

Developing the SA framework:

The methodology should include the testing of *cumulative* effects of all the plan's policies and criteria/definition for boundary changes.

The sustainability objectives should logically follow on from the key sustainability issues and problems as identified. Geodiversity should therefore be added into the objectives. Whilst the protection of the European sites and SSSIs within the area is implied in objective 11, you may wish to consider adding it as a specific objective.

No sustainability indicators are identified in the scoping letter. They should reflect the baseline and objectives and should be set out as part of the SEA scope of the plan.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Corine Dyke on 01872 479590 or corine.dyke@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

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