

Dunkeswell Neighbourhood Plan
Sustainability Appraisal
for Dunkeswell Parish Council

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1. Introduction

- 1.1. Sustainability Appraisal (SA) is a process to assess the environmental, social and economic effects of plans. The purpose is to ensure that plans contribute to delivering sustainable development.
- 1.2. SA is legally required for certain types of plans. However the Department of Communities and Local Government have advised that a separate SA of Neighbourhood Plans is not always required. East Devon District Council has advised the Dunkeswell Neighbourhood Planning Group that a Strategic Environmental Assessment¹ and Habitats Regulation Assessment² are not required for the Dunkeswell Neighbourhood Plan (DNP)³. The DNP Steering Group have decided to undertake a SA as part of good practice. Clare Reid Consultancy was commissioned to do a SA of the DNP.

2. Dunkeswell Neighbourhood Plan

- 2.1. The Neighbourhood Plan area covers the whole Parish of Dunkeswell. The DNP sets out the community's Vision and priorities for how they would like to see the Parish change over the plan period and the local planning policies which will be taken into account in planning decisions. The Plan covers the period between 2014 and 2031.
- 2.2. Dunkeswell is a rural Devon Parish to the north of Honiton and situated in the south western part of the Blackdown Hills Area of Outstanding Natural Beauty (AONB). The parish is on a high plateau 240 metres above sea level that falls steeply on its northern edges and slopes more gently on its south side down to valleys, dotted with dwellings and smallholdings, carved by rivers and streams. It has a long agricultural history which has left a legacy of distinctive field patterns and 'Blackdowns' hedgerows which are an important landscape feature and wildlife habitat.
- 2.3. The settlements in the parish include Dunkeswell village which comprises the 'old' village centred around the church of St Nicholas, the Methodist Chapel and the Village Hall; Highfield Estate located at the southern end of the village; and, the historic World War II airfield (which remains in use today for light aircraft) and industrial estate where the wartime airfield was sited. The outlying areas of Dunkeswell are a series of large farms and significant historical developments such as Stentwood, built in Victorian times and Dunkeswell Abbey, originally the home of the Cistercian abbey built in 1201.

¹ Required under the Environmental Assessment of Plans and Programmes Regulations 2004 which transpose the requirements of the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (known as the SEA Directive)

² Required under The Conservation of Habitats and Species Regulations 2010 which transpose the requirements of the European Directive 92/43/EEC "on the conservation of natural habitats and of wild fauna and flora" (known as the Habitats Directive)

³ Dunkeswell Neighbourhood Development Plan Screening Report, East Devon District Council, March 2015

- 2.4. In 2011, the census recorded that the parish had a population of 1,594 residents in 764 households. Overall, Dunkeswell Parish is likely to see limited growth over the next fifteen years.
- 2.5. The Plan was developed following extensive community consultation, including:
- Public exhibitions, meetings and events;
 - A community questionnaire sent to all households;
 - A business survey sent to all businesses;
 - A young people's event;
 - Directly contacting wider-than-local organisations and agencies (strategic stakeholders) which have an interest in planning issues in the parish; and,
 - Consultation 'windows' during which comments have been invited on draft documents
- 2.6. The DNP includes aims, objectives and policies relating to:
- (a) Natural Environment
 - (b) Built Environment
 - (c) Housing
 - (d) Community Facilities and Services
 - (e) Transport and Accessibility
 - (f) Local Economy
 - (g) Energy and Low Carbon; and
 - (h) Waste.
- 2.7. It does not allocate sites or include housing provision.
- 2.8. The DNP is required to be in general conformity with the strategic policies of the East Devon Local Plan (EDLP) as the primary development plan for the area, which was subject to SEA/HRA and adopted on 28 January 2016⁴. The DNP also has to be in general conformity with the Minerals Local Plan and the Waste Local Plan of Devon County Council which have been subject to separate SAs (available on Devon County Council's website). As the Parish is located within the Blackdown Hills AONB, the policies set out in the AONB Management Plan and other guidance documents (which are advisory rather than carrying statutory weight in the planning system) are also important in Dunkeswell.

3. Methodology

- 3.1. The SA assesses the potential implications of the DNP against a set of social, economic and environmental objectives (see Appendix 1). The SA objectives are taken from the Blackdown Hills AONB Management Plan Strategic

⁴ <http://eastdevon.gov.uk/planning/planning-policy/emerging-plans-and-policies/the-new-local-plan/local-plan-adoption/>

Environmental Assessment Report. The SA criteria are taken from the East Devon Local Plan Sustainability Appraisal. This allows a consistent approach to testing the Plans.

- 3.2. For each sustainability objective, the baseline situation is considered, i.e. what the current situation is. This is used to identify any existing issues that need to be considered. The baseline situation and identified issues are drawn from a variety of documents, references are given at the end of Appendix 1. The SA then assesses how the DNP responds to this issue looking at the DNP as a whole. It lists the relevant DNP aims, objectives, and policies. An overall score is given to the DNP relating to each SA objective (see Table 1 below for scoring system). For some objectives, the DNP is not relevant, and so reasons are given for scoping these out of the SA. The purpose of the SA is to highlight where the DNP might have negative impacts on the sustainability objectives, so that recommendations can be given to avoid or mitigate these. The SA also identifies where the DNP could be strengthened to improve its contribution to the delivery of sustainable development.
- 3.3. An SA assessment was undertaken of the draft Plan prior to consultation (1st draft January 2015). This was then updated to take account of changes made to the DNP in the light of the consultation comments (2nd Draft / pre-submission). A final SA assessment was made of the Submission Version (January 2017).

Table 1: SA scoring system

S++ (S= supports)	Strongly supports the SA objective
S+	Supports the SA objective
N	Is neutral in effect
C- (C=conflicts)	Potentially works against the SA objective
C- -	Strongly works against the SA objective
X	Effects uncertain

4. SA Summary

- 4.1. The results of the SA are set out in Appendix 1 and summarised in Table 2. The DNP is considered to be positive for all the SA objectives and criteria, and in particular it strongly supports objectives relating to protection of the landscape, the character of settlements, and the well-being of local communities.

Table 2 – Summary of SA scores

SA Objectives & factors / criteria	SA score
E1 To protect and enhance the landscape and tranquillity of the Blackdown Hills AONB and its setting.	S++
E2 To protect and enhance biodiversity (habitats and species) and geodiversity within and beyond the AONB.	S+
E3 To conserve and enhance the historic environment and cultural heritage.	S+
E7 To protect the quality and character of individual settlements and material assets.	S++
E4 To mitigate and adapt to climate change including the impacts of flooding.	S+
E5 To protect and enhance natural resources including water, air and soil.	S+
E6 To sustain vibrant communities and safeguard human health & wellbeing.	S++
E8 To promote a thriving economy that supports social and environmental objectives.	S+

5. Recommendations

- 5.1. The SA did not identify any significant adverse effects of the draft Dunkeswell Neighbourhood Plan. However, a number of recommendations were identified which could help to strengthen the sustainability of the Plan.

Table 3 – Sustainability Appraisal Recommendations and changes made to the DNP

SA Objectives & factors / criteria	Recommendations
E1 To protect and enhance the landscape and tranquillity of the Blackdown Hills AONB and its setting.	1. There is no specific reference to protecting tranquillity. The NP should include tranquillity as part of its aims & objectives, and add this to Policy NE1. This would strengthen the Plan in seeking to avoid impacts on the environmental health and amenity of the Parish through noise or light pollution.
E2 To protect and enhance biodiversity (habitats and species) and geodiversity within and beyond the AONB.	2. The parish includes Ancient Woodland sites. Ancient woodland is defined as ‘any wooded area that has been wooded continuously since at least 1600 AD’ and is irreplaceable. Ancient woodland is given protection through the National Planning Policy Framework and East Devon Local Plan Policy D3 Trees and Development Sites which states that ‘ <i>Planning permission will be refused for development resulting in the loss or deterioration of</i>

	<p><i>ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.</i>' This may be considered to provide sufficient protection for ancient woodlands in the parish, however the importance and significance of these sites from a biodiversity and landscape perspective could be highlighted in the NP and reference made to their protection – possibly added to the paragraph on p19 which refers to planning policy protection for trees but doesn't specifically mention the ancient woodland sites (shown in the map on p16). Any loss of ancient woodland should be 'wholly exceptional'.</p>
<p>E3 To conserve and enhance the historic environment and cultural heritage.</p>	<p>3. The aims and objectives could be amended to specifically refer to conservation and enhancement of the historic environment. This would support the policies in the NP to ensure that any development proposals respect the importance of local historic and heritage assets and the traditional built form of the old village and to promote good design.</p>
<p>E7 To protect the quality and character of individual settlements and material assets.</p>	<p>4. None identified.</p>
<p>E4 To mitigate and adapt to climate change including the impacts of flooding.</p>	<p>5. Policy ELC1 - <i>Renewable and Low Carbon Energy Schemes</i> should also refer to protection of the historic environment to avoid adverse impacts of renewable energy schemes for example through unsympathetic changes to traditional buildings, damage to archaeology, or impacts on the settings of listed buildings. This would be consistent with the policy approach for protecting the landscape, biodiversity and wildlife habitats.</p> <p>6. The supporting text for Policy ELC1 also needs to reflect the Written Ministerial Statement on Wind Energy Development (18 June 2015) which requires any proposals for wind energy to be located within suitable areas identified in the development plan policies map, and to demonstrate that the schemes have the backing of the local community. This means that even small scale wind turbines cannot be permitted unless the requirements of the</p>

	Ministerial Statement are fulfilled.
E5 To protect and enhance natural resources including water, air and soil.	7. None identified.
E6 To sustain vibrant communities and safeguard human health & wellbeing.	8. None identified.
E8 To promote a thriving economy that supports social and environmental objectives.	9. None identified.

6 Monitoring and Review

- 6.1 The NP states that ‘the Parish Council will periodically monitor the impact of policies on change in the parish by considering the policies’ effectiveness in the planning application decision making process.’ No significant effects have been identified through the SA and as such do not require monitoring. However, the Parish Council may also wish to consider whether to monitor the effectiveness of the DNP in contributing to sustainable development, in relation to the SA objectives. This could be done through commenting on the positive or negative impacts of decisions on relevant SA objectives. Such monitoring would assist with any reviews that might take place of the DNP.

8. Conclusions

- 8.1 The DNP was considered to be positive for all of the SA objectives. No significant adverse impacts have been identified.
- 8.2 A number of recommendations have been made (as set out in section 5), which would help to strengthen the DNP’s performance in sustainability terms.

Appendix 1 - Sustainability Appraisal of the draft Dunkeswell Neighbourhood Plan

Clare Reid Consultancy, January 2017

(SA undertaken of the submission draft NP)

The table below provides an assessment of the draft Dunkeswell Neighbourhood Plan (NP) against a set of sustainability objectives and criteria identified for this sustainability appraisal (SA). The results are set out in the following table, an explanation of each column is given below.

SA Objectives & factors / criteria: The SA objectives are taken from the Blackdown Hills AONB Management Plan Strategic Environmental Assessment Report. The SA criteria are taken from the East Devon Local Plan Sustainability Appraisal.

Baseline situation/issues: The baseline situation and identified issues are drawn from a variety of documents, references are given at the end of this report.

How does the Neighbourhood Plan respond to this objective?: This column records which parts of the draft NP address the SA objective, looking at the NP as a whole. It lists the relevant NP aims, objectives, and policies.

SA score: This provides an overall assessment of the NP as a whole against the SA objective. The scoring system is set out below:

S++ (S= supports)	Strongly supports the SA objective
S+	Supports the SA objective
N	Is neutral in effect
C- (C=conflicts)	Potentially works against the SA objective
C- -	Strongly works against the SA objective
X	Effects uncertain

Action / recommendations: This column notes any conclusions from the SA and recommendations for the NP Steering Group to consider amendments to the NP in order to strengthen the contribution of the NP to sustainable development.

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SA Objectives & factors / criteria	Baseline situation/issues <i>(Source documents given in brackets, see references at the end of the table)</i>	How does the Neighbourhood Plan respond to this objective?	SA score	Action / recommendations (e.g. consider alternative options and/or mitigation measures)
<p>E1 To protect and enhance the landscape and tranquillity of the Blackdown Hills AONB and its setting.</p> <p><i>Will the plan / policy:</i></p> <ul style="list-style-type: none"> - <i>promote the conservation and wise use of land and protect and enhance the landscape character of East Devon?</i> - <i>maintain the local amenity, quality and character of the local environment?</i> 	<p>Within Blackdown Hills AONB.</p> <p>The parish is wholly within the Blackdown Hills Landscape Character Area. The majority of the area is part of a high plateau that falls steeply on its northern edges and slopes more gently on its south side down to valleys, carved by rivers and streams. (NP)</p> <p>Landscape character has been influenced by farming and land management over the centuries.</p> <p>Historic field patterns and distinctive ‘Blackdowns’ hedgerows (also known as Devon banks) are an important landscape features. (NP)</p> <p>Issues identified through consultation</p> <ul style="list-style-type: none"> - a desire to see any new development screened using native plant species; - a desire to encourage the use of native trees and enforce their planting; - the need to protect traditional hedges. (NP) 	<p>Natural Environment</p> <p>Aim 1 Protect and enhance our unique and special landscape.</p> <p>Aim 2 Recognize we are a living working landscape.</p> <p>Aim 3 Development should be in character and scale.</p> <p>Objective 1a) Ensure new agricultural buildings are suitably designed, use appropriate materials and are placed sympathetically in the landscape.</p> <p>Objective 3a) Any new development should use natural materials wherever possible and should be of an appropriate design and scale so as not to detract from or intrude on the natural beauty of the area.</p> <p>The NP highlights the significance of the parish being within the Blackdown Hills AONB, and the particular emphasis that this places on the conservation and enhancement of the natural beauty of the AONB, in line with its statutory purposes. References is made to the protection given to AONBs in the National Planning Policy Framework and</p>	<p>S++</p>	<p>There is no specific reference to protecting tranquillity. The NP should include tranquillity as part of its aims & objectives, and add this to Policy NE1</p>

	<p>- softening the edges of airfield development to minimise visual impacts of large buildings in prominent locations (EB part 3 p45)</p>	<p>the duty on relevant authorities such as Local Planning Authorities to have regard to AONB purposes in their decision making. The NP also refers to the AONB Management Plan, which does not have any statutory status in the planning system but is an important document in providing evidence for the NP.</p> <p>There are four policies in the NP relevant to this SA objective, including Policy NE1 - <i>Retaining and Enhancing the Natural Beauty of our Parish</i> which provides generic protection for the natural environment. It states that development proposals must have no adverse impacts on the natural environment (landscape and biodiversity) or satisfactorily mitigate such impacts, and enhance the natural environment where there is the opportunity to do so. Appropriate landscaping should be employed to mitigate the impact of the development, including the planting of native trees and hedges to enhance biodiversity.</p> <p><i>Retaining the Quality of Environmental Health and Amenity.</i> Consultation highlighted that the local community wishes to ensure that development should have no adverse impact on the</p>		
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		<p>environmental health and amenity of the parish including noise and light pollution or impacts on air and water quality. The NP states that policies in the adopted Local Plan and other policies proposed in the NP would sufficiently address these concerns.</p> <p>The NP seeks to ensure that the rural character of the landscape including the natural beauty and special character of the AONB landscape are maintained. It recognises that this character has been defined by farming, and that a strong agricultural economy is vital to maintaining this in the future. Traditional farming practises are therefore supported, and any changes in farming methods should not compromise landscape character.- Policy NE2 – <i>Development on Farmland for Agricultural Purposes</i> requires proposals to demonstrate that they will not adversely impact on the landscape character of the AONB or introduce unacceptable levels of HGV movements onto the road network. It also requires that proposals help to reinforce traditional agricultural practices such as Devon banks, hedgerows, coppice, wildlife corridors and the provision of</p>		
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		<p>buildings to support livestock principally kept outside. Any increase in traffic movement including HGVs must be able to be safely accommodated on the rural road network and, where necessary, solutions provided to mitigate increases in traffic caused by the development.</p> <p><i>Policy BE1 – Maintaining the Built Character through High Quality Design</i> requires development proposals to be an appropriate size, scale and location for the surrounding built environment and the materials and design are in keeping with local character. Proposals should be designed in such a way as to minimise impacts on the visual amenity of the surrounding landscape, on views of the proposed development and on the natural environment.</p> <p><i>Policy BE3 – Supporting the Use of the Historic Dunkeswell Airfield</i> sets out the criteria for development including criteria (v) which requires that the character, scale and location of development does not have an adverse impact on the site or its setting in the landscape.</p> <p>Policy TA4 Vehicular Access and Egress</p>		
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		<p>seeks to ensure that vehicular access proposals take into account the significance of Devon hedges in terms of local landscape character, and avoids their loss where this does not compromise safety.</p> <p>Policy LE2 – <i>Industrial Estate</i> supports measures that will improve the visual appearance and security of the industrial estate taking account of the character of the built and natural environment and its setting.</p> <p>There is no specific reference in the NP to protecting tranquillity, although the issue of traffic and HGV movements to the industrial estate in particular are highlighted.</p>		
<p>E2 To protect and enhance biodiversity (habitats and species) and geodiversity within and beyond the AONB. <i>Will the plan / policy:</i> - <i>conserve and enhance the biodiversity of East Devon</i></p>	<p>‘Blackdown’ hedgerows (also known as Devon banks) are important wildlife habitats and corridors.</p> <p>The parish has several designated County Wildlife Sites and Ancient Woodland Sites including Dunkeswell turbarry. There are no County Geological Sites in the parish.</p> <p>The parish has a number of priority habitats including ancient semi-natural</p>	<p>There is nothing specific in the NP aims relating to biodiversity or geodiversity but the objectives include: 1b) Conserve and enhance our bio-diversity 1c) Encourage and enforce tree planting schemes</p> <p>The NP clearly references the importance of the biodiversity of the parish including the designated County Wildlife Sites and Ancient Woodland</p>	S+	<p>The parish includes Ancient Woodland sites. Ancient woodland is defined as ‘any wooded area that has been wooded continuously since at least 1600 AD’ and is irreplaceable. Ancient woodland is given protection through the National Planning Policy Framework and East Devon Local Plan Policy D3 Trees and Development Sites</p>

	<p>woodland and lowland heathland.</p> <p>There are no Sites of Special Scientific Interest (SSSI), Special Areas of Conservation, Special Protection Areas or Ramsar sites in the parish. There is one SSSI (hense Moor Meadows) in the adjoining parish, about 2km from the village of Dunkeswell. The SSSI impact risk zone extends into the parish which means that any planning applications should be assessed for likely impacts on the SSSI.</p> <p>Issues</p> <ul style="list-style-type: none"> - a desire to see any new development screened using native plant species; - a desire to encourage the use of native trees and enforce their planting; and - the need to protect traditional hedges. (NP) 	<p>Sites. It also refers to the protection given to biodiversity and geological conservation interests in the National Planning Policy Framework and the Local Plan policies. However, it picks up locally specific issues where consultation has indicated that further policy and guidance is needed, particularly the protection of traditional hedges (which are rich in biodiversity) and the use of native trees and species in planting schemes.</p> <p>Policy NE1 – <i>Retaining and Enhancing the Natural Beauty of our Parish</i> states that development proposals must have no adverse impacts on the natural environment (landscape and biodiversity) or satisfactorily mitigate such impacts, and enhance the natural environment where there is the opportunity to do so. Appropriate landscaping should be employed to mitigate the impact of the development including the use of native species in planting schemes. Where change to existing traditional Devon banks is unavoidable, the least damaging option to the hedgebank and its biodiversity should be chosen. Reference is also made to Highways Agency guidance</p>		<p>which states that <i>‘Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.’</i> This may be considered to provide sufficient protection for ancient woodlands in the parish, however the importance and significance of these sites from a biodiversity and landscape perspective could be highlighted in the NP and reference made to their protection – possibly added to the paragraph on p19 which refers to planning policy protection for trees but doesn’t specifically mention the ancient woodland sites (shown in the map on p16). Any loss of ancient woodland should be ‘wholly exceptional’.</p>
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		<p>relating to changes to hedgerows as a result of highway proposals.</p> <p>The NP seeks to ensure that the rural character of the natural environment are maintained. It recognises that traditional farming practices have helped to create and manage the biodiversity of the parish, and that a strong agricultural economy is vital to maintaining this in the future. Traditional farming practises are therefore supported. Policy NE2 – <i>Development on Farmland for Agricultural Purposes</i> requires that proposals help to reinforce traditional agricultural practices such as Devon banks, hedgerows, coppice, wildlife corridors and the provision of buildings to support livestock principally kept outside.</p>		
<p>E3 To conserve and enhance the historic environment and cultural heritage. <i>Will the plan / policy:</i> - <i>maintain and enhance built and historic assets?</i></p>	<p>There are a number of features of special importance in the parish including the remains of the Dunkeswell Abbey, a Bronze Age barrow within the old village (a Scheduled Monument), 15 listed buildings in the old village, the Church of St Nicholas and the historic airfield. (NP)</p> <p>The old village of Dunkeswell is a</p>	<p>There is nothing specific in the aims regarding historic environment although Aim 4 refers to preserving the overall character of settlements and Aim 5 refers to valuing the assets of the historic airfield.</p> <p>Objective 4b) seeks to maintain historic character of the AONB by using local materials.</p> <p>Objective 1d) is to protect archaeological</p>	S+	<p>The aims and objectives could be amended to specifically refer to conservation and enhancement of the historic environment.</p>

	<p>Conservation Area. The Conservation Area Management Plan identifies three issues that compromise its overall character and appearance:</p> <ul style="list-style-type: none"> - the prominence of overhead power lines in prominent locations; - the use of inappropriate materials as means of enclosure in the public realm - temporary roofs and claddings on agricultural buildings <p>The historic World War II airfield (which remains in use today for light aircraft) and industrial estate (where the wartime airfield was sited) form an important part of the parish. (NP)</p> <p>The remains of the Dunkeswell Abbey is on English Heritage’s “Heritage at Risk Register” due to deterioration and loss of fabric (EH)</p> <p>Almost 85% of respondents to the community survey in 2014 said that the historic airfield is important to preserve. (NP)</p> <p>Across the rest of the parish there are other potentially important</p>	<p>sites.</p> <p>The NP references policies in the National Planning Policy Framework and Local Plan which provide protection for the historic environment. It also refers to the AONB Management Plan which seeks to ensure that all development conserves historic character. The NP includes specific policies to reflect local distinctiveness and help ensure that any development proposals respect the importance of local historic and heritage assets and the traditional built form of the old village and to promote good design.</p> <p><i>Policy BE1 – Maintaining the Built Character of Our Parish through High Quality Design</i> seeks to ensure that development is high quality and sympathetic to the traditional built character of the parish.</p> <p><i>Policy BE2 – Protecting Our Valued Historic and Heritage Assets in Dunkeswell Parish</i> requires a Heritage Statement of Significance or Planning Statement to demonstrate that proposals have taken into account the latest Conservation Area Appraisal(s)</p>		
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	<p>archaeological, heritage and historic assets (NP)</p> <p>Issues:</p> <ul style="list-style-type: none"> - Conflict between preserving historic airfield and the natural environment against enabling its use for employment and as an active airfield. (NP) 	<p>and any additional supporting evidence documenting local historic and heritage assets. The statement should also demonstrate that proposals will not adversely affect nationally and locally designated and protected historic buildings, the Dunkeswell Village Conservation Area and other valued archaeological, heritage and historic assets in the parish, or that adverse impacts can be satisfactorily mitigated. Archaeological finds must be recorded where relevant.</p> <p>The historic airfield is an important part of the parish’s heritage and there is a specific policy relating to the use of the airfield which seeks to achieve a balance between use of the airfield, the employment uses on the industrial estate, the site’s historical interest and the need for the site to respect the natural environment and landscape within which it is set. Policy BE3 – <i>Supporting the Use of the Historic Dunkeswell Airfield</i> sets out the criteria for development. Proposals must be compatible with the existing uses of the site (employment, leisure and light aviation); and not compromise its historic value. Safeguards are included to</p>		
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		<p>avoid noise, air and light pollution and harm to the amenity of residents. There are also criteria relating to traffic, road safety; and impacts on the site or its setting in the landscape.</p> <p>The issues identified in the Conservation Area Management Plan are addressed in the NP through Policy BE1 which requires materials and design to be in keeping with local character and includes specific provisions relating to street furniture.</p> <p>The issue relating to overhead power lines is not a planning matter and is something that will require the utility company to address through undergrounding, where resources allow.</p> <p>The NP also states that the Parish Council will work with the local community to identify other potentially important archaeological, heritage and historic assets to be included on East Devon District Council's "local list" of heritage assets.</p> <p><i>HP2 – Making Best Use of Existing Buildings for Housing</i> supports the conversion, sub-division or extension of existing residential buildings or</p>		
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		<p>redundant structures such as barns. Whilst this is positive in relation to the SA objectives for communities and reducing the need for development on greenfield sites and can also be positive for the historic and built environment through ensuring the continued use and maintenance of existing buildings, any proposals would also need to be considered in the context of the Local Plan policy D8 which sets out a number of criteria to ensure that they are done sensitively in relation to rural setting and character of the building. Unsympathetic conversions or redevelopment can affect the character of traditional buildings, and the cumulative impact of minor changes can also be detrimental to the overall character of a settlement. Redundant buildings are often important habitats for wildlife including protected species such as bats and barn owls and policy D8 requires a bat and barn owl survey to be carried out.</p>		
<p>E7 To protect the quality and character of individual settlements and material assets. <i>Will the plan / policy:</i> - <i>maintain and enhance</i></p>	<p>The built character of Dunkeswell such as the old village and the historic airfield contributes significantly to the sense of place and the parish's identity. There are significant historic and heritage assets and valued structures and buildings of</p>	<p>Built Environment Aim 4 Preserve the overall character of our settlements within the AONB. Objectives: 4a) Limit the height of new buildings where appropriate to minimise impact</p>	S++	None identified.

<p><i>the vitality and viability of the Towns of East Devon?</i></p>	<p>local importance. The landscape setting of the village is important. These factors all come together to make up the character of the parish. (NP)</p> <p>Issues from consultation</p> <ul style="list-style-type: none"> - poor design of more modern developments. 	<p>on landscape character.</p> <p>4b) Maintain historic character of the AONB by using local materials whenever possible or it is important to do so – bad design should not be replicated in areas of new development.</p> <p>4c) Ensure signage and street furniture is appropriate to the AONB with regard to scale, colour and cumulative impact.</p> <p>Aim 5. Value the assets of the historic airfield while avoiding significant increases in noise or congestion.</p> <p>Objective 5a) Support use of historic airfield and leisure opportunities in employment, without significantly increasing noise, traffic and pollution.</p> <p>Natural Environment</p> <p>Aim 3 Development should be in character and scale</p> <p>Objective</p> <p>3a) Any new development should use natural materials wherever possible and should be of an appropriate design and scale so as not to detract from or intrude on the natural beauty of the area.</p> <p>Policy BE1 – <i>Maintaining the Built Character of Our Parish through High Quality Design</i> seeks to ensure that development is high quality and</p>		
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		<p>sympathetic to the traditional built character of the parish. This includes consideration of the size, scale and location of development in relation to the setting of the surrounding built environment, and the use of materials and design that are in keeping with the built character. The policy also includes specific reference to street furniture and signage to ensure that these are also in keeping with the local character. Proposals for residential development are expected to comply with the Blackdown Hills Area of Outstanding Natural Beauty Design Guide for Houses.</p>		
<p>E4 To mitigate and adapt to climate change including the impacts of flooding. <i>Will the plan / policy:</i></p> <ul style="list-style-type: none"> - <i>promote and encourage non-car based modes of transport and reduce journey lengths?</i> - <i>contribute towards a reduction in local emissions of greenhouse gases?</i> - <i>ensure that there is no increase in the risk of flooding?</i> - <i>ensure energy</i> 	<p>Sustainable transport</p> <p>Dunkeswell Parish is some way off the main road network and is accessible only by rural roads. (NP)</p> <p>The new village is separated from the old village by a narrow road which is not paved for most of its length. (NP)</p> <p>The parish is served by the number 20 bus service which provides five journeys a day or more from Taunton to Honiton. (NP)</p>	<p>Transport and Accessibility</p> <p>Aim 11 Maximize accessibility and encourage low carbon options.</p> <p>The NP reflects the results of community consultation which indicated that people would like to walk more but felt that this required a better and safer set of off-road footpaths, bridleways and cycling routes around the Parish.</p> <p>Policy TA1 - <i>Rights of Way (Public Footpaths, Pavements, Bridleways and Cycleways)</i> supports improvements to the network through provision of new or extended routes.</p>	<p>S+</p>	<p>Policy ELC1 - <i>Renewable and Low Carbon Energy Schemes</i> should also refer to protection of the historic environment.</p> <p>The supporting text for Policy ELC1 also needs to reflect the Written Ministerial Statement on Wind Energy Development (18 June 2015) which requires any proposals for wind energy to be located within suitable areas identified in the development plan policies</p>

<p><i>consumption is as efficient as possible?</i></p>	<p>Multiple car-ownership amongst households is high; but 10% of households don't have regular access to a car. (NP)</p> <p>Dunkeswell is served by a ring and ride community transport service for the less mobile. (NP)</p> <p>There are a network of local footpaths and bridleways. Road safety and traffic are concerns locally. Consultation indicated more people would walk if footpaths were available. A footpath between old Dunkeswell and the estate is a long standing priority locally.</p> <p>Flood risk</p> <p>There is limited flood risk within the parish although some areas at risk of surface water flooding around the airfield. (EA)</p> <p>Renewable energy</p> <p>The potential renewable energy resource in the area could be considerable, for example, windy exposed plateau locations for wind</p>	<p>A new walking and cycle route linking Highfield, the old part of the village with the industrial estate is specifically supported through Policy TA2 – <i>New Walking and Cycle Route Links in Dunkeswell</i>.</p> <p>Policy TA5 – <i>Reducing Traffic Impact</i> seeks to minimise the impact of non-local traffic, and HGVs in particular, on the existing residential areas of the Parish.</p> <p>The NP provides strong support for climate change mitigation in relation to Energy and Low Carbon.</p> <p>Aim 16 Support small scale, unobtrusive renewable or low carbon energy schemes providing they are sensitively sited and screened (appropriately landscaped).</p> <p>Objective 16b) Encourage the use of solar technology on farm building, domestic and industrial buildings.</p> <p>Objective 16c) Investigate the potential and promote the installation of hydro power and emerging renewable solutions which fit with the aims of the AONB.</p> <p>16d) Encourage the use small to medium non-obtrusive wind turbines, in</p>		<p>map, and to demonstrate that the schemes have the backing of the local community. This means that even small scale wind turbines cannot be permitted unless the requirements of the Ministerial Statement are fulfilled.</p>
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	<p>power, extensive woodland coverage. However this is significantly restricted by the potential landscape effects of renewable or low carbon energy development – either a site-specific local impact or the broader landscape impact of larger installations. (EB)</p> <p>An assessment of types of renewable energy within the AONB concluded that small scale technologies could be accommodated, but large scale wind turbines, waste to energy plants, centralised anaerobic digestion plant and large-scale 10-40MW electricity generation plant would not be appropriate within the AONB. “Renewable Energy in the Blackdown Hills” report. (EB)</p> <p>Issues:</p> <ul style="list-style-type: none"> - road safety concerns particularly the lack of a footpath between old Dunkeswell and the estate - lack of a primary school in the parish which means children have to be driven to school each day - potential conflicts between promoting renewable energy and protecting the natural and historic environment of the AONB. 	<p>suitable locations.</p> <p>16a) Ensure that Dunkeswell is ready and able to accommodate advances in technology.</p> <p>16e) Resist industrial scale renewable energy development on any agricultural land, common land and open spaces.</p> <p>Policy ELC1 - <i>Renewable and Low Carbon Energy Schemes</i> supports proposals for renewable or low carbon energy schemes provided there is no adverse impact on the landscape, biodiversity and wildlife habitats. Proposals should be of an appropriate scale, be sensitively sited and landscaped, and do not interfere with the aerodrome. Reference is made to the advice given in the “Renewable Energy in the Blackdown Hills Report”, 2010. However, no reference is made in the policy to the historic environment, which should also be protected from potential impacts from renewable energy schemes for example through unsympathetic changes to traditional buildings, damage to archaeology, or impacts on the settings of listed buildings.</p> <p>Aim 17 - Increase recycling levels and</p>		
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		<p>Policy W1 - <i>Minimising Waste in Dunkeswell</i> will also contribute to climate change mitigation.</p> <p>There is currently limited risk of flooding in the parish, although there are some areas where surface water flooding could occur, particularly around the airfield. The National Planning Policy Framework and Local Plan provide policies to address flood risk as part of planning proposals. Policy BE1- <i>Maintaining the Built Character through High Quality Design</i> supports the use of appropriate sustainable urban drainage systems (SUDS) and other measures to reduce surface water run-off. Policy TA3 – <i>Off-road Parking Proposals</i> also includes caveats to ensure that the provision of additional off-road parking does not impact on surface water flooding.</p>		
<p>E5 To protect and enhance natural resources including water, air and soil. <i>Will the plan / policy:</i></p> <ul style="list-style-type: none"> - <i>maintain & enhance the environment in terms of air, soil & water quality.</i> - <i>promote wise use of waste</i> 	<p>Water quality in the Madford river is poor (failing element is fish). (EA)</p> <p>Farming and land management is important to local character, particularly the maintenance of traditional farming practises.</p>	<p>Natural Environment</p> <p>Aim 1. Protect and enhance our unique and special landscape.</p> <p>Objective 1e) Accept no increase in local pollution levels of sound, noise, light, air or water quality and resist any development that increases pollution levels as well as place conditions on any</p>	S+	None identified.

<p><i>resources whilst reducing waste production and disposal?</i></p>	<p>Air quality is generally good and there are no Air Quality Management Areas in the Parish.</p> <p>There are concerns locally over noise pollution particularly from the airfield and traffic.</p> <p>There is support for increasing recycling levels in the parish. (NP)</p>	<p>application where there may be a threat of pollution (e.g. operating hours, lighting hours etc).</p> <p>Aim 5. Value the assets of the historic airfield while avoiding significant increases in noise or congestion.</p> <p>The NP states that the policies in the Local Plan alongside the controls placed upon development proposals in the NP adequately deal with the potential environmental impacts of proposals in Dunkeswell, – <i>Retaining the Quality of Environmental Health and Amenity.</i></p> <p>The NP supports measures to minimise waste and increase recycling.</p> <p>Aim 17 Increase recycling levels.</p> <p>Policy W1 – <i>Minimising Waste in Dunkeswell</i> supports measures to minimise household and employment premises’ waste and use of water, and promote reuse, recycling and composting, where these are compatible with the purpose of the AONB and its special qualities.</p> <p>Policy LE1 Live-work units supports appropriate live-work space on previously developed land including the existing employment area. This will</p>		
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		encourage sustainable development through the re-use of land and buildings and minimise the need for Greenfield development.		
<p>E6 To sustain vibrant communities and safeguard human health & wellbeing.</p> <p><i>Will the plan / policy:</i></p> <ul style="list-style-type: none"> - ensure everybody has the opportunity to live in a decent home? - ensure all groups of the population have access to community services? - provide for education, skills & lifelong learning to meet local needs? - improve health - reduce crime fear of crime? - reduce noise levels & exposure to unacceptable levels of noise pollution? - maintain & improve cultural, social & leisure provision? 	<p>Population</p> <p>The population grew significantly in the mid to late 1980s with a 550 dwelling development taking place in the village. The population of the parish as a whole was 1,584 in 2011 across 764 households. (NP)</p> <p>The majority of households in the parish are single person households (255 in number / 33.4%) and married couples with no dependent children (278 in number / 36.4%). (2011 Census)</p> <p>16.6% of the population is aged 17 or under with 32.3% of the population in the 30 – 59 age group and 34.2% over 64. (2011 Census)</p> <p>Housing</p> <p>The existing housing stock is made up of 289 detached houses; 311 semi-detached houses; 171 terraced houses; 19 flats; 2 caravans /temporary accommodation units. (NP)</p>	<p>The NP recognises the particular issues facing rural areas in relation to the provision of housing and the maintenance of community services and facilities, particularly within the context of the AONB designation.</p> <p>The NP does not identify sites for housing development and supports the Rural Exception site approach set out in the Local Plan. Local needs identified through consultation include sheltered housing, shared ownership housing for young people and housing suitable for families wishing to remain in the Parish. The principle of live-work units is also supported.</p> <p>Housing</p> <p>Aim 6 Limit housing developments in appropriate location to meet proven local need.</p> <p>Aim 7 Improve flexibility of local supply to meet the needs of local community.</p> <p>Aim 8 Housing developments should meet standards in terms of space and parking whilst not conflicting with local</p>	S++	None identified

	<p>649 of homes are owner-occupied, 55 private rented and 60 social rented / 'other' rented accommodation. (NP)</p> <p>The affordability ratio (i.e. ratio between earnings and house price) is 18.1 (with the England average being 15.4). (NP)</p> <p>55 new dwellings have been completed in the last 7 years and 26 dwellings with existing permission which had yet to be built (as of 31st March 2014). (NP)</p> <p>The Local Plan identifies the parish as countryside and no housing allocations are made. Any housing coming forward would have to be on a rural exceptions basis to meet an identified local need. (NP)</p> <p>There is support for development which meets the needs of retired and elderly people and the need for the housing stock to be able to meet the needs of an ageing population, where those resident in the parish would wish to stay here but may not have an option to do that within the current stock and types of dwellings available. (NP)</p> <p>The East Devon Strategic Housing Land</p>	<p>environment.</p> <p>Policy HP1 – <i>Responding to Demonstrable Local Housing Need</i> requires development proposals to demonstrate how the proposal responds positively to identified local housing market needs, and the needs of local residents, in terms of the housing type and tenure.</p> <p>Policy HP2 – <i>Making Best Use of Existing Buildings for Housing</i> supports the conversion, sub-division or extension of existing residential buildings or redundant structures such as barns.</p> <p>Community Facilities and Services Aim 9 Protect and develop community facilities and services. Aim 10 Develop local infrastructure that promotes sustainability and community wellbeing.</p> <p>Policy CFS1 – <i>Preventing the Loss of Local Community Facilities, Services and Open Spaces used for Recreation</i> seeks to protect locally valued community facilities, services and open spaces used for recreation.</p>		
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	<p>Availability Assessment (SHLAA) suggests that the village can physically accommodate some small scale housing development (EB part 1)</p> <p>Community facilities and services There is a small shopping centre, post office and a doctors’ surgery. The old village contains the church and village hall (NP)</p> <p>There are relatively high satisfaction level with existing facilities. There is broad support to expand and enhance local facilities.</p> <p>Education There are no schools in the village. Currently children are transported to schools elsewhere. There is a pre-school in the village. (NP)</p> <p>Transport and Accessibility Dunkeswell Parish is some way off the main road network and is accessible only by rural roads. (NP)</p> <p>The new village is separated from the old village by a narrow road which is not paved for most of its length. (NP)</p>	<p>Policy CFS2 – <i>Access to Play and Recreation Facilities</i> supports the provision of new play space and recreation facilities and improved accessibility where they do not have an adverse impact on the amenity of nearby residents in terms of noise, light and visual appearance.</p> <p>Transport and Accessibility Aim 11 Maximize accessibility and encourage low carbon options. Aim 12 Improve road safety and minimize intrusion.</p> <p>Policy TA1 - <i>Rights of Way (Public Footpaths, Pavements, Bridleways and Cycleways)</i> supports the improvement and enhancement of public rights of way. A new walking and cycle route linking Highfield, the old part of the village with the industrial estate is specifically supported through Policy TA2 – <i>New Walking and Cycle Route Links in Dunkeswell</i>.</p> <p>Policy TA3 – <i>Off-road Parking Proposals</i> supports the provision of additional off-road parking where it can be done without adversely affecting the local character of the built, the</p>		
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	<p>The parish is served by the number 20 bus service which provides five journeys a day or more from Taunton to Honiton. (NP)</p> <p>Multiple car-ownership amongst households is high; but 10% of households don't have regular access to a car. (NP)</p> <p>Dunkeswell is served by a ring and ride community transport service for the less mobile. (NP)</p> <p>The historic Dunkeswell aerodrome provides accessibility by light aircraft. (NP)</p> <p>Traffic in the village is a concern including heavy goods vehicles accessing the aerodrome and employment site.</p> <p>Issues</p> <ul style="list-style-type: none"> - Housing needs locally are focused less on affordable social housing but for tenures including shared ownership, private rent for young and retired people and sheltered housing for the elderly (NP). - There is an identified need for at least 3 shared ownership homes (1 / 2 and 3 	<p>surrounding natural environment and visual amenity of the area, and does not impact on surface water flooding. The policy also seeks to ensure that development which may reduce the number of existing off-road parking spaces does not lead to additional on-road parking or affect pedestrian safety.</p> <p>Policy TA4 - <i>Vehicular Access and Egress Arrangements</i> seeks to ensure new or improved vehicular access and egress avoids impacts on safety, landscape and setting of the proposed access.</p> <p>Policy TA5 – <i>Reducing Traffic Impact</i> seeks to minimise the impact of non-local traffic, and HGVs in particular, on the existing residential areas of the Parish.</p> <p>Delivery</p> <p>Policy DP1 – <i>Delivery Priorities</i> seeks to ensure that any developer contributions generated from section 106 planning obligations or the Community Infrastructure Levy (CIL) contribute towards local priority community projects. This will help to support existing community facilities and services and deliver wider community benefits.</p>		
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	<p>bedroom dwellings) (Shared Ownership Housing Assessment report 2014)</p> <ul style="list-style-type: none"> - Updated evidence is required to establish current housing need (NP) - The local community wishes to ensure that the facilities, services and open space used for recreation are sufficient in scale and scope to meet future demands in the light of increasing population. (NP) - The community have identified the need for a primary school in the parish. (NP) - Impact of heavy goods vehicles and traffic from the aerodrome and its industrial estate. (NP) - Concern amongst many residents about pedestrian safety in areas without proper footpaths. (NP) - Concerns over on-street car parking as an existing issue and one that could increase with the rise in multi-car ownership and increase in the parish's population. - Strict standards for access to development are damaging local character and hedgebanks or preventing development. 			
<p>E8 To promote a thriving economy that supports social</p>	<p>The Blackdown Hills are not a self-contained economic area, and are</p>	<p>Local Economy Aim 13 Promote a sustainable diverse</p>	<p>S+</p>	<p>None identified.</p>

<p>and environmental objectives. <i>Will the plan / policy:</i></p> <ul style="list-style-type: none"> - <i>provide for education, skills and lifelong learning to: (ii) meet local employment needs?</i> - <i>maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce?</i> - <i>encourage and accommodate both indigenous and inward investment?</i> 	<p>heavily influenced by surrounding market towns with many residents commuting further afield. (BH AONB Management plan)</p> <p>The airfield and industrial estate is a significant employment area within the parish and AONB. (NP)</p> <p>Despite Dunkeswell being the business/employment centre of the Blackdown Hills, there is a higher percentage of unemployed residents than most other parishes in the BlackdownHills area. (NP)</p> <p>The local economy also needs to meet the needs of young people trying to enter the employment market. (NP)</p> <p>The principle of people working from home and living and working on the same site is supported (NP).</p> <p>Innovative small businesses and enterprises need help to form. (NP)</p> <p>Local people said in 2011 that they wanted to see the existing industrial area re-developed but with no overall increase in floor area and with</p>	<p>and vibrant local economy. Aim 14 Improve broadband and connectivity. Aim 15 Encourage and support local enterprise</p> <p>Natural Environment Aim 2 Recognize we are a living working landscape Objective 2a) Allow changes that are needed which support traditional farming approaches 2b) Resist factory farming whilst encouraging the continuation or re-introduction of local and traditional farming methods 2c) Support initiatives for the production, marketing and retailing of local food.</p> <p>Policy LE1 - <i>Live-work</i> Workspace supports the development of live-work space on previously developed land, principally on the existing industrial estate employment area, where there is a local economic need and this does not adversely impact on the supply of employment land, the character of the built natural environment, and the amenity of residents such as traffic and noise pollution. Measures are included</p>		
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	<p>restrictions on the kind of industry, to ensure no increase in heavy industrial traffic. (NP)</p> <p>Farming is an important part of the economy. (NP)</p> <p>Tourism</p> <p>Tourism in the parish is limited. Local people would like to see small scale tourism supported in the parish. A substantial majority of people who responded to the survey would support small scale development proposals such as pubs and catering establishments, hotel/guest house accommodation, small camp sites (including traditional camping, and yurts and shepherd huts, etc.) and self-catering accommodation. (NP)</p> <p>Broadband</p> <p>Fast and reliable connection will be essential in future for running successful businesses, accessing services and assistance, furthering education and creating a breadth of opportunities for personal growth and development. (NP)</p> <p>Issues:</p>	<p>to ensure that the policy is not used to achieve wholly residential units.</p> <p>Policy LE2 – <i>Industrial Estate</i> supports measures that will improve the visual appearance and security of the industrial estate.</p> <p>Policy LE3 – <i>Conversion of Agricultural Buildings</i> supports the conversion of existing agricultural buildings for business or business-related purposes where the benefits of such development outweigh any harm to local character, residential amenity or highway safety, will be supported, subject to the conversion not requiring substantial rebuilding, or resulting in disproportionate extension.</p> <p>Policy LE4 – <i>Small Scale Camping Sites</i> supports small-scale camp sites (including yurts, shepherds huts and traditional camping) subject to a number of criteria to protect the natural and built environment, pollution and avoid impacts on neighbouring properties.</p> <p>Policy LE5 – <i>Superfast Connectivity</i> supports super-fast broadband infrastructure where it is sensitively sited</p>		
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	<ul style="list-style-type: none"> - The conflict between the airfield employment site, character of the built and natural environment, and amenity of residents including traffic and noise - The need to support viability of farm businesses but retain traditional farming and the character of traditional farm buildings - Support for the local economy through tourism but without detriment to the natural and built environment. - The need for superfast broadband. (NP) 	and sympathetically designed.		
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Source documents:

Submission Draft Dunkeswell Neighbourhood Plan (NP)

Dunkeswell Evidence Base (provided by Stuart Todd Associates) (EB)

Blackdown Hills AONB Management Plan SEA (SEA)

Magic Map <http://www.magic.gov.uk/MagicMap.aspx> (MAGIC)

Environment Agency - What's in my backyard <http://apps.environment-agency.gov.uk/wiyby/default.aspx> (EA)