

East Devon Villages Plan Development Plan Document

Sustainability Appraisal Post-Adoption Statement

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Contact details

Planning Policy
East Devon District Council
Knowle, Sidmouth, EX10 8HL

Phone: 01395 571533

Email: planningpolicy@eastdevon.gov.uk

www.eastdevon.gov.uk/planning/planning-policy/
@eastdevon

To request this information in an alternative format or language please phone 01395 516551 or email csc@eastdevon.gov.uk

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1. Introduction

- 1.1 East Devon District Council adopted the East Devon Villages Plan Development Plan Document (DPD) on 26th July 2018.¹ The Villages Plan follows on from the Local Plan,² by identifying a built-up area boundary (BUAB) around the 15 settlements listed in Strategy 27 of the Local Plan.
- 1.2 The Villages Plan is accompanied by a Sustainability Appraisal (SA) Report,³ which is a statutory requirement when preparing a DPD. SA involves appraising the likely significant social, economic and environmental effects of options and policies in the plan against a set of sustainability objectives. The aim is to ensure that the plan maximises its contribution to sustainable development, and minimises any potential adverse impacts.
- 1.3 Strategic Environmental Assessment (SEA) is also a statutory process, required under the European SEA Directive, transposed into UK law by the SEA Regulations.⁴ The Government recommend that these two statutory requirements (SA and SEA) are addressed by carrying out a single process of Sustainability Appraisal. This approach has been followed in undertaking SA of the Villages Plan.
- 1.4 This SA post-adoption statement satisfies the SEA Regulations, by explaining:
 - How sustainability considerations have been integrated into the Villages Plan
 - How the SA Report has been taken into account
 - How the results of consultation have been taken into account
 - Reasons for choosing the adopted Villages Plan as adopted, in light of reasonable alternatives
 - Measures to monitor the significant sustainability effects of the Villages Plan

¹ The adopted Villages Plan can be seen here: [Adoption - East Devon](#)

² East Devon Local Plan 2013 to 2031, adopted January 2016: <http://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

³ The final Villages Plan SA Report can be seen here: [Adoption - East Devon](#)

⁴ Statutory Instrument 2004 no. 1633 'Environmental Protection – The Environmental Assessment of Plans and Programmes Regulations 2004': <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made>

2. How sustainability considerations have been integrated into the Villages Plan

- 2.1 SA (incorporating SEA) has been carried out as an iterative and ongoing process alongside the Villages Plan. The SA findings have been documented at each key stage of preparing the Villages Plan, from SA scoping in March 2016 to the Main Modifications consultation in November 2017. This has ensured that sustainability considerations have been fully integrated into the Villages Plan at all stages of preparation.
- 2.2 The SA process began with ‘scoping’ which collated a review of relevant policies, plans and programmes, along with baseline information. This informed the ‘SA framework’ comprising 20 objectives, which were used to assess the likely effects of the options and policies in the Villages Plan. Figure 2.1 below sets out the SA framework, along with the SEA topic(s) covered by each objective.

Figure 2.1: Sustainability Appraisal framework for the Villages Plan

| SA Objectives | Relevant SEA Topic(s) covered |
|--|--|
| 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 the historic environment, heritage assets and their settings | 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. |

| SA Objectives | Relevant SEA Topic(s) covered |
|---|--|
| 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 and geodiversity of East Devon, including the protection of European sites and SSSI's. | 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, particularly in the River Axe which does not currently meet Water Framework Directive targets. | Soil, water, air. |
| 14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change. | Air, climatic factors. |
| 15. To ensure that there is no increase in the risk of flooding as a result of development. | 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. |

2.3 The Built-up Area Boundaries for each village, and reasonable alternatives, were subject to SA; along with the policies in the Plan. A range of different sustainability effects were identified. Given the nature of the effects, and existing policies (particularly the Local Plan) to mitigate such effects, no mitigation measures were suggested for the Villages Plan.

2.4 This integration of sustainability considerations into the Villages Plan has been crucial in documenting the sustainability effects of the plan, and showing that it is the most appropriate strategy in light of reasonable alternatives.

3. How the Sustainability Appraisal Report has been taken into account

Introduction

- 3.1 As previously highlighted, the iterative nature of carrying out Sustainability Appraisal (SA) meant that sustainability findings were documented at each stage of preparing the Villages Plan. SA Reports described the approach taken and the effects identified, with recommendations to avoid or minimise negative effects or enhance positive effects. This chapter explains how the SA findings were taken into account when preparing the Villages Plan.
- 3.2 The key preparation stages and the relationship between the Villages Plan and SA process discussed above are outlined in figure 3.1. This shows the SA documents that have been taken into account in preparing the Plan. Web links to the documents are included for ease of reference. Further detail on each stage follows figure 3.1.

Figure 3.1: Villages Plan and Sustainability Appraisal – key stages of preparation

| Plan iteration | Accompanying SA work |
|--|--|
| N/A | SA Scoping letter (March 2016) sent to the consultation bodies (Environment Agency, Natural England, Historic England) for comments by 27 April 2016 |
| Consultation draft Villages Plan , public consultation 3 August to 28 September 2016 | SA Report of draft Villages Plan , public consultation 3 August to 28 September 2016 |
| Proposed Submission Villages Plan , public consultation 22 March to 10 May 2017 | SA Report of Proposed Submission Villages Plan and non-technical summary , public consultation 22 March to 10 May 2017 |
| Villages Plan schedule of Main Modifications , public consultation | SA Report (updated to incorporate Main Modifications) and non-technical |

| Plan iteration | Accompanying SA work |
|-------------------------------------|---|
| 18 December 2017 to 2 February 2018 | summary , public consultation 18 December 2017 to 2 February 2018 |

Scoping

- 3.3 The SA process began in March 2016 with the scoping stage. This set out the baseline information relevant to the Villages Plan, alongside the policy context, key sustainability issues, and the SA framework (shown in figure 2.1) against which plan options and policies would be appraised.

Villages Plan – Draft for consultation

- 3.4 The East Devon Villages Plan ‘draft for consultation’ (August 2016), contained draft Built-up Area Boundaries (BUABs) for each village, along with ‘reasonable alternatives’; the extent of authorised uses at Greendale and Hill Barton business parks; and draft policies protecting the vitality of Beer and Colyton centres.
- 3.5 The Plan was accompanied by an SA Report that set out the methodology, sustainability context, and sustainability effects of four possible options for BUAB definition (along with three rejected options). The option for BUAB definition that performed best in the SA – use existing core built form but also look at pedestrian accessibility to facilities – was taken forwards in the Villages Plan. Options to define, or not, a retail boundary at Beer and Colyton were subject to SA. The most sustainable option to define a retail boundary was included in the Plan.

Proposed Submission Villages Plan

- 3.6 The ‘proposed submission’ Villages Plan (March 2017) included ‘final’ BUABs for each village; the extent of authorised uses at Greendale and Hill Barton business parks; and ‘final’ policies protecting the vitality of Beer and Colyton centres.
- 3.7 The accompanying SA Report (and non-technical summary) again contained the methodology and sustainability context. The preferred ‘strategic’ option in the SA Report of using the existing core built form to define boundaries alongside consideration of pedestrian accessibility to facilities was included in the Villages Plan.
- 3.8 The SA Report presented findings for each of the Village BUABs, and also for ‘reasonable alternatives’ identified at seven of the villages. These findings were used to inform the Plan, with the best performing BUABs in the SA taken forward in the Plan.

- 3.9 In addition, an option for further growth at Greendale and Hill Barton business parks was appraised, along with a ‘business as usual’ option not to allow growth. The option not to allow growth performed better in the SA due to positive environmental effects, and this is the approach carried forward in the Villages Plan.
- 3.10 Again, options to define, or not, a retail boundary at Beer and Colyton were presented in the SA, with the most sustainable option to define a retail boundary included in the Plan.
- 3.11 The Villages Plan and SA Report were then submitted for Examination by a Planning Inspector in June 2017.

Villages Plan Schedule of Main Modifications

- 3.12 Following the Examination hearing sessions (held in November 2017), a schedule of main modifications to the Villages Plan was required. The SA Report and non-technical summary were updated to incorporate the main modifications, identifying the likely significant effects that would arise as a result. Five of the 12 main modifications resulted in new or amended policies, and these were subject to SA. The schedule of main modifications also included a monitoring table, informed by the suggested indicators for monitoring the sustainability effects in the SA Report.
- 3.13 Public consultation took place on the updated SA (and non-technical summary) alongside the schedule of main modifications to the Villages Plan.

4. How the results of consultation have been taken into account

- 4.1 As set out in the previous chapter, an SA Report was published for consultation alongside the Villages Plan at key stages of its preparation. This chapter provides an overview of the results of consultation on the various SA documents, and how they have been taken into account. There were no requests from another EU Member State on potential transboundary effects, so consultation of this nature was not required.⁵

Scoping

- 4.2 A scoping letter was sent to the ‘consultation bodies’ (Environment Agency, Natural England, Historic England) in March 2016 for comments by 27 April 2016. Responses were received from each of the three organisations, which resulted in a number of amendments, including reference to additional plans and policies relating to flood risk, heritage and environmental designations; further baseline data on water quality, the historic environment, and bats; and changes to several objectives in the SA framework.
- 4.3 The detailed points raised on the scoping letter, and how they were addressed, are in Appendix 1 of the SA Report.

SA of the Villages Plan – Draft for consultation

- 4.4 Public consultation on the East Devon Villages Plan ‘draft for consultation’ took place from August to September 2016. An SA Report was published for consultation alongside the Plan.
- 4.5 Six organisations commented specifically on the SA Report, as detailed in the SA Report, Appendix 2. Concerns relating to the impact upon the historic environment resulted in further evidence being gathered for the proposed built-up area boundary (BUAB) at Musbury.
- 4.6 It was suggested that each village BUAB should be underpinned by SA. The council agreed that further detail on the sustainability effects of each BUAB would be useful, and consequently each BUAB, and reasonable alternatives, were subject to SA.

⁵ Regulation 16(4)(d), The Environmental Assessment of Plans and Programmes Regulations 2004.

- 4.7 A large site on the edge of Feniton was suggested for inclusion in consultation on the plan itself, rather than the SA. Due to its large scale, and different sustainability implications, this site was subject to SA.
- 4.8 The other comments made on the SA Report advocated additional development in the villages; but adverse environmental effects and lack of consistency with the Local Plan meant that the SA was not amended.

SA of the Proposed Submission Villages Plan

- 4.9 Only two consultees made comments on the SA Report published for consultation alongside the ‘proposed submission’ Villages Plan in March to May 2017.⁶ The SA findings were noted on heritage issues; and a different strategic option for one of the villages was suggested.
- 4.10 No amendments to the SA were required as a result of these comments.

SA of the Villages Plan Schedule of Main Modifications

- 4.11 An SA Report was published alongside the Schedule of Main Modifications from December 2017 to February 2018. No comments were made on this SA Report.

⁶ See SA comments in Appendix 2 of the Consultation Statement: <http://eastdevon.gov.uk/planning-libraries/villages-plan-examination-2017/vp07aconsultationstatement.pdf>

5. Reasons for choosing the adopted Villages Plan in the light of reasonable alternatives

- 5.1 Developing alternatives for the Villages Plan was an iterative process, involving public consultation and assessing effects through the SA. The policy context had already been set by the Local Plan, so the scope when preparing the Villages Plan was relatively limited – the Local Plan is clear that the fundamental role of the Villages Plan is to establish built-up area boundaries (BUABs) around the 15 identified villages.
- 5.2 It is important to note that alternatives (also referred to as ‘options’) need to be “reasonable” – this broadly means different realistic and deliverable options in developing policies, which are sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

Strategic Options

- 5.3 ‘Strategic options’ for BUAB definition considered four different overall approaches to defining boundaries that would accommodate higher or lower levels of development:
- Option 1 – Use the existing core built form to define boundaries
 - Option 2 – Apply option 1 but an additional variant to also look at pedestrian accessibility to facilities
 - Option 3 – Draw boundaries more tightly than the core built form with the explicit intent to reduce levels of development
 - Option 4 – Draw boundaries that are larger than the core built form to accommodate more village development
- 5.4 Overall, option 2 performed best in the SA by having broadly more positive effects and fewer negative effects than the other three options, and was chosen as the preferred approach. Option 2 seeks to accommodate new development in locations that respect the core built form, minimising adverse impacts upon landscape character. This option ensures facilities are accessible by pedestrians and therefore has significant positive benefits in respect of access to facilities and health. Encouraging non-car based travel also scores a significant positive.
- 5.5 Option 1 performs similarly to option 2, but is not taken forward as it does not incorporate consideration of pedestrian accessibility to services, so is less sustainable well on issues related to this. Option 3 is not preferred as it would limit

housing (compared to other options), and have ensuing negative social and economic impacts. Option 4 scores more positively in terms of housing delivery, but is not preferred due to adverse environmental effects, including upon landscape character, biodiversity, and through encouraging more car use.

Village Built-up Area Boundaries

- 5.6 Following on from these ‘strategic options’, which set an overall approach for defining BUABs at the villages; an appraisal of the BUABs at each Village, along with reasonable alternatives, was undertaken. The BUABs were chosen as they were consistent with strategic option 2, and had positive effects on objectives relating to homes, services, education, culture, transport, waste, and vitality. Positive scores were common at most villages for on health, landscape, air, soil, water objectives.
- 5.7 There are potentially numerous alternatives for BUABs, bearing in mind that small scale sites all around the village could be included (or not). Detailed SA of such options would be disproportionate given the strategic nature of SAs; and that alternatives should be sufficiently distinct to be considered “reasonable”. The establishment of strategic option 2, alongside a criteria-based methodology for defining the boundaries, meant that alternatives that were outside the core built form and beyond pedestrian accessibility could generally be excluded.
- 5.8 The Consultation Draft Villages Plan (August 2016) included reasonable alternatives for seven of the village BUABs. In some of these cases (Beer, Clyst St Mary, Musbury, Uplyme), the sustainability effects were likely to be the same, so the desire to include the built form (arising from strategic option 2) was applied.
- 5.9 Two alternatives approaches were considered at Feniton: the ‘old’ village was excluded because of a lack of community facilities and the presence of designated heritage assets; and a large site to the north west was excluded due to negative environmental effects and not matching the level of jobs with the economically active workforce.
- 5.10 The inclusion of the western part of Newton Poppleford in the BUAB was not the preferred alternative due to poor pedestrian access to community facilities, and adverse biodiversity effects.
- 5.11 At West Hill, an alternative that included the southern part of the village was not preferred due to poor pedestrian access to facilities, and adverse biodiversity effects.
- 5.12 No “reasonable alternatives” were identified for the other villages.

5.13 Policy VP01 explains the relationship between the BUABs defined in the Villages Plan and other parts of the development plan. Policy VP01 is likely to have positive sustainability effects on homes, services, education, health, culture, transport, waste and vitality. As this policy was requested by the Inspector during the Examination in order to make the plan ‘sound’, and there are no reasonable alternatives that would achieve this outcome.

Village/Town Centre Vitality policies at Beer and Colyton

5.14 Policies VP02 and VP03 set out the approach to ensuring village/town centre vitality at Beer and Colyton, respectively. Vitality and shopping areas are defined on a map of these two settlements. These policies were chosen as they are considered to have a range of benefits, with significant positive effects on services, culture and vitality; and positive effects on health, heritage, amenity, transport, employment, and investment.

5.15 The alternative not to define these boundaries performs less well in the SA due to the potential loss of retail/commercial premises, limiting access to facilities and cultural provision, adversely impacting the economy, vitality and viability of Beer and Colyton. There could also be detrimental impacts upon quality of the built environment as retail properties are converted to residential uses.

Greendale and Hill Barton Business Parks

5.16 Policies VP04 and VP05 apply to Greendale and Hill Barton Business Parks, respectively; accompanied by inset maps showing the extent of authorised uses at these parks. The policies make clear that development proposals will be considered in accordance with the relevant policies of the development plan, particularly Strategy 7.

5.17 Policies VP04 and VP05 were chosen due to positive effects upon landscape, amenity and biodiversity objectives, as further development is resisted. Similarly, air, soil and water quality should be maintained; and there should be no increase in flood risk.

5.18 A reasonable alternative to allow the expansion of Greendale and Hill Barton business parks was also appraised. Whilst this would mean significant positive economic effects, there would be negative impacts upon landscape character, local environment, biodiversity, greenhouse gas emissions and the objective to promote non-car modes of travel. Given this range of negative effects, the expansion of these business parks was not chosen as the preferred approach.

6. Measures to monitor the significant sustainability effects of the Villages Plan

6.1 Monitoring the significant sustainability effects of implementing the Villages Plan can help identify any unforeseen adverse effects at an early stage, enabling remedial action to be taken if required. Monitoring should be focussed on the significant effects, rather than trying to monitor everything.

6.2 The indicators for monitoring the sustainability effects of the Villages Plan are set out in the following table. It should be noted that objective 5 is not included as no effects have been identified from the Villages Plan for this objective.

Figure 6.1: Indicators for monitoring the sustainability effects of the Villages Plan

| SA Objectives for which potential effects have been identified | Suggested Indicators |
|--|---|
| 1. To ensure everybody has the opportunity to live in a decent home. | <ul style="list-style-type: none"> • Number of new homes built annually at each village – both inside and outside of boundaries. • Number and percentage of new homes built that are affordable. |
| 2. To ensure that all groups of the population have access to community services. | <ul style="list-style-type: none"> • Number of residential completions in settlements covered by Villages Plan outside of the BUAB. • Number of new homes built that are within walking distance of basic village facilities. |
| 3. To provide for education, skills and lifelong learning | <ul style="list-style-type: none"> • Number of state primary schools opened or closed in settlements with a BUAB. • Number of new school places created in the defined villages. |
| 4. To improve the population's health | <ul style="list-style-type: none"> • There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on life expectancy in the District. |
| 6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution. | <ul style="list-style-type: none"> • There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on number of noise pollution incidents reports annually. |

| SA Objectives for which potential effects have been identified | Suggested Indicators |
|---|--|
| 7. To maintain and improve cultural, social and leisure provision. | <ul style="list-style-type: none"> • Number of planning permissions granted that result in a net loss of cultural, social or leisure provision in settlements with a BUAB. |
| 8. To maintain and enhance the historic environment, heritage assets and their settings. | <ul style="list-style-type: none"> • Net change in number of heritage assets on the 'Heritage at Risk Register' for settlements with a BUAB. |
| 9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon. | <ul style="list-style-type: none"> • Amount and percentage of new development at villages with a BUAB taking place on brownfield land. |
| 10. To maintain the local amenity, quality and character of the local environment. | <ul style="list-style-type: none"> • There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on number of complaints made to EDDC regarding noise pollution. |
| 11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's. | <ul style="list-style-type: none"> • Number of designated sites 'lost' to development in villages with BUABs. • Number of dwellings granted permission that contribute to habitat mitigation programmes. |
| 12. To promote and encourage non-car based modes of transport and reduce journey lengths. | <ul style="list-style-type: none"> • Levels and frequency of bus services in the District's villages. |
| 13. To maintain and enhance the environment in terms of air, soil and water quality, particularly in the River Axe which does not currently meet Water Framework Directive targets. | <ul style="list-style-type: none"> • Number of declared Air Quality Management Areas (AQMAs) in villages. |

| SA Objectives for which potential effects have been identified | Suggested Indicators |
|--|--|
| 14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change. | <ul style="list-style-type: none"> Renewable energy capacity installed by type in villages. |
| 15. To ensure that there is no increase in the risk of flooding as a result of development. | <ul style="list-style-type: none"> Number of planning permissions granted in settlements included in Villages Plan contrary to the advice of the Environment Agency or Devon County Council as Lead Local Flood Authority in relation to flood risk, surface water drainage or water quality. |
| 16. To ensure energy consumption is as efficient as possible. | <ul style="list-style-type: none"> Renewable energy capacity installed by type in villages. |
| 17. To promote wise use of waste resources whilst reducing waste production and disposal. | <p>There are no village specific indicators that are identified to readily allow for monitoring of this objective. It should be noted that the Local Plan SA advises of use of data on:</p> <ul style="list-style-type: none"> Volume of waste generated in the District annually. Percentage of waste generated in the District that is recycled. |
| 18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce. | <ul style="list-style-type: none"> Amount of land (defined by completed sqm gross floorspace) developed for employment by type in villages. Amount of employment land lost to residential development in villages. |
| 19. To maintain and enhance the vitality and viability of Villages of East Devon. | <ul style="list-style-type: none"> Amount of completed retail development in villages. |
| 20. To encourage and accommodate both indigenous and inward investment. | <ul style="list-style-type: none"> Amount of land (defined by completed SqM gross floorspace) developed for employment by type in villages. |