

East Devon Villages Plan Development Plan Document

Sustainability Appraisal Report (updated to incorporate Main Modifications)

December 2017

Contents

1	Introduction	3
	The Adopted East Devon Local Plan and Context for the Villages Plan.....	3
	Sustainability Appraisal and Strategic Environmental Assessment	5
	Structure of this report	5
2	Methodology	10
	Stage A: Scoping.....	11
	Stage B: Developing and refining options and assessing effects	14
	Stage C: Preparing the Sustainability Appraisal report	17
	Stage D: Consultation on the Draft Villages Plan and this SA report.....	17
	Stage E: Monitoring implementation of the Draft Villages Plan	17
	Difficulties Encountered and Assumptions made	17
3	Sustainability Context for Development at East Devon Villages	19
	Review of Plans, Policies and Programmes.....	19
	Baseline Information.....	20
	Key Sustainability Issues	23
4	Sustainability Appraisal of Reasonable Alternatives.....	26
	The Role of Built-up Area Boundaries for Villages	26
	Description of Reasonable Alternatives for Built-up Area Boundaries – Strategic Options	29
	Description of Rejected Alternatives for Built-up Area Boundaries – Strategic Options....	30
	Appraisal of the Strategic Options for Built-up Area Boundary definition.....	31
	Reasonable alternatives for BUABs at the Villages and Reasons for selecting the preferred option	34
	Reasonable alternatives for Village/Town Centre vitality Policies at Beer and Colyton	39
5	Sustainability Appraisal of the Villages Plan.....	42
	Village Built-up Area Boundaries	42
	Village/Town Centre vitality and Greendale/Hill Barton policies	46
	Cumulative effects of the Villages Plan.....	48
	Recommendations – Mitigation measures and Maximising the benefits of the Villages Plan	50
6	Monitoring.....	51
7	Conclusions	54
	Appendix 1 - Feedback Received to Scoping Report Consultation.....	55
	Appendix 2 – Summary of main issues raised on the draft Sustainability Appraisal Report (July 2016) and how they have been addressed	61
	Comments made specifically on the Sustainability Appraisal Report	61

Comments suggesting alternative Built-up Area Boundaries at the Villages	63
Appendix 3 - Review of plans, policies and programmes	65
Appendix 4 – Appraisal Matrices	82
Appraisal Matrix of Strategic Options for Built-up Area Boundary definition	82
Appraisal Matrix of Options for Greendale and Hill Barton Business Parks.....	94
Appraisal Matrix of Options for Village Centre vitality policies at Beer and Colyton.....	100
Appraisal Matrix of Policy VP01 and Village Built-up Area Boundaries	106
Appraisal Matrix of Village/Town Centre vitality Policies	199
Appraisal matrix of Policy VP04 – Greendale Business Park and Policy VP05 – Hill Barton Business Park	205
Appendix 5 – Built-up Area Boundary criteria.....	210

1 Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by the Planning Policy section of East Devon District Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging East Devon Villages Development Plan Document (also known as the “Villages Plan”). East Devon District Council has appointed the consultants LUC to act as a guide and mentor to assist with the SA work. The Council has adopted a standard format devised by LUC, amended where appropriate, to inform the work. It is stressed, however, that this is a report of East Devon District Council who take responsibility for document content.
- 1.2 This is the SA report of the East Devon Villages Plan incorporating Main Modifications, and it should be read in conjunction with that document.

The Adopted East Devon Local Plan and Context for the Villages Plan

- 1.3 The East Devon Local Plan was adopted on the 28 January 2016 and it provides policy to address the bulk of development proposals and planning applications across East Devon: [Local Plan 2013-2031 - East Devon](#). The Local Plan was accompanied by a [Sustainability Appraisal Report](#). For selected villages, the Local Plan advises of production of the Villages Plan.
- 1.4 Strategy 27 of the adopted Local Plan, Development at the Small Towns and Larger Villages, states:

“The following settlements vary in size and character but all offer a range of accessible services and facilities to meet many of the everyday needs of local residents and they have reasonable public transport. They will have a Built-up Area Boundary that will be designated in the East Devon Villages DPD though they will not have land specifically allocated for development.

- *Beer*
- *Broadclyst*
- *Clyst St Mary*
- *Colyton*
- *East Budleigh*
- *Feniton*
- *Kilmington*
- *Lympstone*
- *Musbury*
- *Newton Poppleford*
- *Sidbury*
- *Uplyme*
- *West Hill*

- *Whimble*
- *Woodbury*

If communities wish to promote development other than that which is supported through this strategy and other strategies in the Plan (at the settlements listed above or any other settlement) they will need to produce a Neighbourhood Plan or promote community led development (for example Community Land Trusts) justifying how and why, in a local context, the development will promote the objectives of sustainable development.”

- 1.5 The Villages Plan explicitly seeks to ensure that the above policy will come into effect and that Built-up Area Boundaries will be defined around the listed villages. It should be noted that Colyton is a small town but in the context of this SA, and for ease of reference, it is placed under the ‘villages’ heading/terminology.
- 1.6 East Devon Local Plan Strategy 6 – Development within Built-Up Area Boundaries provides an overview for development proposals that come forward within the boundaries. The Villages Plan does not seek to adjust or alter Local Plan policy wording; its over-riding key task is to put Built-up Area Boundaries (define black lines) on to village maps. The scope of the Villages Plan, as set out in the Local Plan is:
- the definition of Built-up Area Boundaries around the 15 settlements listed in Strategy 27 of the Local Plan (with the exception of Lypstone as it has a ‘made’ neighbourhood plan at the time of ‘publication’ of the Villages Plan);
 - the identification of any local plan policies on specific settlement ‘inset’ plans; and
 - defining inset plans for Greendale and Hill Barton Business Parks.
- 1.7 The Villages Plan includes overarching policies that explain Built-up Area Boundaries and the approach at Greendale and Hill Barton Business Parks, and policies for retail/commercial area and frontage protection for Beer and Colyton (resisting ‘loss’ to other uses, notably residential).
- 1.8 During the Examination of the Villages Plan, the Inspector considered that Main Modifications would be required to make the plan ‘sound’; therefore, this SA Report relates to the East Devon Villages Plan incorporating Main Modifications. It has been informed by SA consultation findings at the ‘Scoping’ stage, the ‘draft’ stage, and ‘Proposed Submission’ stage.
- 1.9 This SA report is being published for consultation alongside the East Devon Villages Plan incorporating Main Modifications. Any comments specifically on this report should be headed “East Devon Villages Plan Sustainability Appraisal Report – December 2017” and submitted via:
- Email to: planningpolicy@eastdevon.gov.uk or
 - Post to: Planning Policy Section, East Devon District Council, Knowle, Sidmouth, EX10 8HL
- 1.10 **The consultation period runs from 18 December 2017 to 2 February 2018.**

Sustainability Appraisal and Strategic Environmental Assessment

- 1.11 SA is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.12 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive is:
- “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development”.*
- 1.13 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. This Guidance makes clear that SA should only focus on what is needed to assess the likely significant effects of the Plan, focussing on the environmental, economic and social impacts that are likely to be significant. The Guidance goes on to say that SA does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Plan.¹
- 1.14 The SA/SEA of the Villages Plan is being prepared in line with this integrated approach and throughout this report the abbreviation “SA” should therefore be taken to refer to “SA incorporating the requirements of SEA”.

Structure of this report

- 1.15 This report is the SA report for the East Devon Villages Plan incorporating Main Modifications (December 2017). **Table 1** below signposts how the requirements of the SEA Regulations have been met within this SA report.

Table 1: Requirements of the SEA Regulations and where these have been addressed in this SA Report

¹ Planning Practice Guidance Reference ID: 11-009-20140306.

SEA Regulation Requirements	Where covered in this SA report
<p>Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):</p>	
<p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes</p>	<p>Chapter 1, 3, Appendix 3.</p>
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme</p>	<p>Chapter 3.</p>
<p>c) The environmental characteristics of areas likely to be significantly affected</p>	<p>Chapter 3.</p>
<p>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.</p>	<p>Chapter 3.</p>
<p>e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation</p>	<p>Chapter 3 and Appendix 3.</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)</p>	<p>Chapter 4, 5, Appendix 4.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>Chapter 5.</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapters 2 and 4.</p>
<p>i) a description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 6.</p>

SEA Regulation Requirements	Where covered in this SA report
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>A separate non-technical summary document has been prepared to accompany this SA report.</p>
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)</p>	<p>Addressed throughout the SA report.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4) 	<p>Consultation on the SA/SEA scoping letter was received from Natural England, Historic England and the Environment Agency. A record of the comments on the SA Scoping Report and responses to the comments, including action taken, is in Appendix 1.</p>
<ul style="list-style-type: none"> authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2) 	<p>Consultation was undertaken on the Draft East Devon Villages Plan from August - September 2016. The results of this consultation have been taken into consideration in preparing this SA Report. A record of the comments on the SA Report of the Consultation Draft East Devon Villages Plan, and responses to the comments including action taken, is provided in Appendix 2.</p>
<ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	<p>Not applicable.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</p>	

SEA Regulation Requirements	Where covered in this SA report
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9) 	<p>To be addressed after the Villages Plan is adopted.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>To be addressed after the Villages Plan is adopted.</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>The report is to be produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met.</p>

1.16 This section has introduced the SA of the East Devon Villages Plan incorporating Main Modifications. The remainder of the report is structured as follows:

- **Chapter 2: Methodology** describes the approach that has been taken to the SA of the Draft Villages Plan.
- **Chapter 3: Sustainability context for development at East Devon Villages** summarises the relationship between the Villages Plan and other relevant plans, policies and programmes; describes the social, economic and environmental characteristics of the area and identifies the key sustainability issues.
- **Chapter 4: Sustainability Appraisal of Reasonable Alternatives** sets out the SA findings for identified reasonable alternatives.
- **Chapter 5: Sustainability Appraisal of the Villages Plan** contains the findings of the SA of Villages DPD.
- **Chapter 6: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the Villages Plan and proposes monitoring indicators.

- **Chapter 7: Conclusions** summarises the key findings from the SA and describes the next steps to be undertaken in the preparation of the Villages Plan and the SA.

The SA report is supported by the following appendices:

- **Appendix 1** – presents the comments that were received in relation to the Scoping consultation undertaken in March and April 2016.
- **Appendix 2** – contains the consultation responses that were received on the draft East Devon Villages DPD SA Report, dated July 2016.
- **Appendix 3** – includes a review of plans, policies and programmes.
- **Appendix 4** – presents the SA matrices for the Strategic Options for BUAB definition, Greendale and Hill Barton Business Parks, policies VP01 – 05 and each Village BUAB. Maps of reasonable alternatives to the Village BUAB are also included (where identified).
- **Appendix 5** – sets out the criteria that were used to determine Built-up Area Boundaries in the Villages Plan.

2 Methodology

- 2.1 In addition to complying with legal requirements the approach being taken to the SA of the Villages Plan is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process. **Table 2** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2: Corresponding stages in plan making and SA

Local Plan Step 1: Evidence Gathering and engagement
SA stages and tasks
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <p>1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>2: Collecting baseline information</p> <p>3: Identifying sustainability issues and problems</p> <p>4: Developing the SA framework</p> <p>5: Consulting on the scope of the SA</p>
Local Plan Step 2: Production
SA stages and tasks
<p>Stage B: Developing and refining options and assessing effects</p> <p>1: Testing the Plan objectives against the SA framework</p> <p>2: Developing the Plan options</p> <p>3: Evaluating the effects of the Plan</p> <p>4: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>5: Proposing measures to monitor the significant effects of implementing the Plans</p>
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <p>1: Preparing the SA Report</p>
<p>Stage D: Seek representations on the Plan and the Sustainability Appraisal Report</p> <p>1: Public participation on Plan and the SA Report</p> <p>2(i): Appraising significant changes</p>
Local Plan Step 3: Examination
SA stages and tasks

2(ii): Appraising significant changes resulting from representations
Local Plan Step 4 & 5: Adoption and Monitoring
SA stages and tasks
3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the Plan
1: Finalising aims and methods for monitoring
2: Responding to adverse effects

2.2 The methodology set out below describes the approach that has been taken to the SA of the Villages Plan to date and provides information on the subsequent stages of the process. Where appropriate, the SA of the Villages Plan is drawing from the SA/SEA work that has been carried out over the last few years in relation to the East Devon Local Plan.

Stage A: Scoping

2.3 The SA process began in March 2016 with the production of a Scoping Letter for the Villages Plan. Given the narrow scope of the Villages Plan, plus the fact that a detailed SA Scoping consultation had already been undertaken for the East Devon Local Plan, East Devon District Council prepared a consultation Scoping letter instead of a full Scoping Report. The letter set out the scope of the SA work that would be undertaken for the Villages Plan and was sent to the statutory environmental bodies for comment.

2.4 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The SA Scoping letter for the Villages Plan presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Villages Plan, and which shape the policy context for its development, were identified and the relationships between them were considered. This included policies from the East Devon Local Plan. This process enables any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- Baseline information was collected on environmental, social and economic issues of relevance to the Villages Plan area, drawing on the information that was collated and regularly updated throughout the SA of the East Devon Local Plan. This baseline information provides the basis for predicting and monitoring the likely effects of the Villages Plan and helps to identify alternative ways of dealing with any adverse effects identified.
- Key sustainability issues for the Villages were identified, drawing from those identified in the East Devon Local Plan SA where relevant.
- The Sustainability Appraisal framework that was used in the SA of the East Devon Local Plan was presented, comprising the SA objectives against which

options and subsequently policies would be appraised. It was considered appropriate to make use of this SA framework rather than developing a new framework as those objectives have been designed to address the key sustainability issues facing East Devon District, which are also relevant at the local level to the villages. The SA framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. It sets out a series of sustainability objectives that define long-term aspirations for the villages of East Devon with regard to social, economic and environmental considerations.

- The SA Scoping letter also included details of the proposed assessment methodology for the Villages Plan, drawing on the methodology used previously for the SA of the East Devon Local Plan. Details of the proposed structure of the SA Report and next steps in the SA and Plan-preparation process were also provided.
- 2.5 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping letter for the Villages Plan was published in March 2016 for a six week consultation period with the "consultation bodies" (Natural England, the Environment Agency and Historic England).
- 2.6 **Appendix 1** summarises the comments that were received during the Scoping consultation and describes how each one has been addressed in the SA work undertaken since then. In light of the comments received a number of amendments have been made to the review of plans, policies and programmes, the baseline information and the key sustainability issues (see **Chapter 3**), and these sections of the SA report will continue to be updated as necessary at each stage of the process to ensure that they reflect the current situation in respect of the East Devon villages covered by this plan and take account of the most recent sources of information. A number of consultation comments were also received from consultees in relation to the SA framework and those have been addressed as appropriate, as described in **Appendix 1**.
- 2.7 **Table 3** presents the SA framework for the Villages Plan which includes 20 headline SA objectives, as well as showing how all of the "SEA topics" have been covered by the SA objectives. Various changes have been made to the SA framework following the Scoping consultation. These changes relate to testing the cumulative effects of the plans, policies and criteria for boundary change and to Objectives 8, 11, 13 14 and 15 as set out in **Table 3 below** (additional text is shown underlined and deleted text ~~struck through~~).

Table 3: Relationship of SA Objectives to SEA Regulatory Requirements

SA Objectives	Relevant Topic(s) covered, as set out in the SEA Regulations
1. To ensure everybody has the opportunity to live in a decent home.	Population, human health, material assets.

SA Objectives	Relevant Topic(s) covered, as set out in the SEA Regulations
2. To ensure that all groups of the population have access to community services.	Population, human health, material assets.
3. To provide for education, skills and lifelong learning	Population, material assets.
4. To improve the population's health	Population, human health.
5. To reduce crime and fear of crime.	Population, human health.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	Population, human health.
7. To maintain and improve cultural, social and leisure provision.	Population, material assets.
8. To maintain and enhance built and historic assets. <u>To maintain and enhance the historic environment, heritage assets and their settings</u>	Cultural heritage including architectural and archaeological heritage.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	Soil, landscape.
10. To maintain the local amenity, quality and character of the local environment.	Fauna, flora, soil, water, air, landscape.
11. To conserve and enhance the biodiversity <u>and geodiversity</u> of East Devon, <u>including the protection of European sites and SSSI's.</u>	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, <u>particularly in the River Axe which does not currently meet Water Framework Directive targets.</u>	Soil, water, air.
14. To contribute towards a reduction in local emissions of greenhouse gases <u>and increase the capacity of villages to adapt to climate change.</u>	Air, climatic factors.
15. To ensure that there is no increase in the risk of flooding <u>as a result of development.</u>	Water, human health, material assets.

SA Objectives	Relevant Topic(s) covered, as set out in the SEA Regulations
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.

Stage B: Developing and refining options and assessing effects

- 2.8 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other “reasonable alternatives” to the options being considered for a plan.
- 2.9 Regulation 12 (2) of the SEA Regulations requires that:
- “The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*
- (a) implementing the plan or programme; and*
 - (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”*
- 2.10 It is worth highlighting that only “likely significant effects” must be identified, not all possible effects. Schedule 1 of the SEA Regulations sets out the general criteria of significance, and these have been considered in the scoring approach that has been used.
- 2.11 It should also be noted that any alternatives (also referred to as ‘options’) considered to the plan need to be “reasonable”. Although “reasonable alternative” is not defined in the SEA Directive, European Commission guidance² considers an alternative to be a different way of fulfilling the objectives of the plan, which should be realistic, and falls within the legal and geographic competence of the authority. National Government guidance states that *“reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They*

² Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment, European Commission, 2003.

must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”³

- 2.12 This implies that alternatives that are not reasonable do not need to be subject to appraisal. Some examples of unreasonable alternatives could include policy options that do not meet the objectives of the Plan or national policy (e.g. the National Planning Policy Framework), or development site options that are unavailable or undeliverable.
- 2.13 It also needs to be recognised that the SA/SEA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select an option. Factors such as consultation responses, deliverability, and conformity with national policy will also be taken into account by plan-makers when selecting options for their plan. In the case of the Villages Plan, conformity with the East Devon Local Plan (adopted January 2016) is also desirable.
- 2.14 The adopted East Devon Local Plan is very clear that the fundamental role of the Villages Plan is to establish Built-up Area Boundaries (BUABs) around the 15 identified villages. The alternative to not define Built-up Area Boundaries has already been considered in the Local Plan, through the SA of options for distributing development at the villages⁴. This limits the potential options that can be considered in the Villages Plan.
- 2.15 Reasonable alternatives are considered in Chapter 4 of this report. Strategic Options for Built-up Area Boundary definition consider a range of differing ways to define boundaries that would accommodate higher or lower levels of development depending on the degree to which houses, gardens, open spaces and other land that may have development potential is included within boundaries, especially at the edges of the villages. Pedestrian accessibility also features in the options appraised.
- 2.16 Following on from these Strategic Options, an appraisal of the BUABs at each Village has been undertaken (with the exception of Lypstone where the BUAB is defined in the ‘made’ Neighbourhood Plan, and no changes are proposed to this through the Villages Plan). A detailed methodology for determining BUABs (in Appendix 5) was applied to each Village, and a site by site analysis was undertaken. This informed the reasonable alternatives which were then subject to SA.
- 2.17 Given the above discussion on reasonable alternatives and strategic options, the following Villages have larger areas of land that were considered as reasonable alternatives in the Consultation Draft Villages Plan: Beer, Clyst St Mary, Feniton, Newton Poppleford, Uplyme and West Hill. A site submitted at Feniton during consultation was also subject to SA as an alternative given its large scale.
- 2.18 The Strategic Options, alongside a detailed methodology and site by site analysis for boundary definition and SA of the BUABs, negates the need for detailed site by site or land area by land area Sustainability Appraisal at all Villages – such a detailed

³ Planning Practice Guidance Reference ID: 11-018-20140306.

⁴ This is detailed in Table A8.2 in the Local Plan Sustainability Appraisal Report.

evaluation of every single plot or area of land through the SA would be disproportionate and not appropriate, for what is a strategic assessment. If the Villages Plan was explicitly seeking to allocate land for development then this detailed SA may be considered appropriate, but it is not.

- 2.19 Given that the Local Plan is comprehensive in its policy coverage, only five policies have been included in the Villages Plan – these provide an overarching approach to considering development proposals in the BUABs and Greendale/Hill Barton Business Parks; and town/village vitality policies at Beer and Colyton. Options to allow either further growth at the business parks, or a continued restrictive policy, were subject to SA.
- 2.20 The assessment of the effects of these options was carried out using each of the 20 objectives identified in Table 3 earlier in this chapter. The following symbols are used for setting out findings against each objective.

Table 4: Key to symbols and colour coding used in the SA of the Villages Plan

++	The option is likely to have a significant positive impact on the SA objective(s).
+	The option is likely to have a positive impact on the SA objective(s).
0	The option is likely to have a negligible or no impact on the SA objective(s).
-	The option is likely to have a negative impact on the SA objective(s).
--	The option is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s), due to a lack of data.
+ / -	The option is likely to have a mixture of positive and negative impacts on the SA objective(s).

- 2.21 Where a potential positive or negative effect is uncertain, a question mark is added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).
- 2.22 The likely effects of the options need to be determined and their significance assessed and this inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of a magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

Stage C: Preparing the Sustainability Appraisal report

- 2.23 This SA report describes the process that has been undertaken to date in carrying out the SA of the Villages Plan. It sets out the findings of the appraisal of options, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects), making recommendations where possible for ways that plan policy could be developed to reduce potential negative effects and maximise the benefits of the Plan.

Stage D: Consultation on the Draft Villages Plan and this SA report

- 2.24 The 'publication' draft Villages Plan and SA Report was published for consultation from March – May 2017. As set out in the consultation statement,⁵ no responses were submitted at this stage that required amendments to the SA Report.
- 2.25 Following discussion at the Examination hearing sessions, East Devon District Council is now inviting comments on the East Devon Villages Plan incorporating Main Modifications and this SA Report. Both documents are being published on the Council's website for consultation from **18 December 2017 to 2 February 2018**.

Stage E: Monitoring implementation of the Draft Villages Plan

- 2.26 Recommendations for monitoring the social, environmental and economic effects of implementing the Villages Plan are presented in **Chapter 6**.

Difficulties Encountered and Assumptions made

- 2.27 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. The appraisal of policy options has been based on broad principles for defining where Built-up Area Boundaries may fall and so the assessment has concentrated on the general scale of development that might come forward under differing options and some of the potential impacts on land that might be subject to development under alternative approaches. The actual appraisal has not looked at all land areas on a site by site, field by field, house/dwelling by house/dwelling basis.
- 2.28 In respect of policies relating to main town centre uses in Beer and Colyton, a number of general assumptions have had to be made about the possible nature of impacts that may arise. It has not been possible and it would not be reasonable to look at specific sites or buildings and in practice there could be site specific matters that run counter to the general commentary provided. On this issue, however, there is/would be expected to be clauses or qualifying considerations in policy that would for example set out cases and circumstances where conversion or redevelopment, on balance, would be acceptable or reasonable.
- 2.29 It should be noted that Grade 3 agricultural land comprises both Grade 3a and Grade 3b agricultural land. Only Grade 3a agricultural land, which covers about 21% of England's farmland, falls into the classification of best and most versatile agricultural

⁵ East Devon Villages Plan – consultation statement (submission), June 2017, Appendix 2: <https://eastdevon.gov.uk/planning-libraries/villages-plan-examination-2017/vp07aconsultationstatement.pdf>

land. The NPPF advises that planning authorities should seek to use areas of poorer quality land for development in preference to that of a high quality. The breakdown between Grade 3a and Grade 3b agricultural land is not available for the Villages Plan area, and therefore under the precautionary principle it is assumed that Grade 3 land has the potential to be best and most versatile agricultural land.

3 Sustainability Context for Development at East Devon Villages

- 3.1 This chapter presents the review of relevant plans, policies and programmes and baseline information for the East Devon Villages, which together provide the sustainability context for the preparation of the Villages Plan. At the end of the chapter the key sustainability issues for Villages are identified along with commentary on likely changes or evolution without the Villages Plan. These issues relate directly to the sustainability objectives that are used in the Built-up Area Boundary appraisal (see chapter 4 of this report).
- 3.2 The chapter has been informed by comments received during the Scoping consultation in March 2016, and the draft consultation published in August 2016.

Review of Plans, Policies and Programmes

- 3.3 The Villages Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels. Of most clear cut importance is, however, that it implements policies of the adopted East Devon Local Plan, this is its remit with limited scope to deviate.
- 3.4 Schedule 2 of the SEA Regulations requires the SA report to include:
- (1) *“an outline of the...relationship with other relevant plans or programmes”*; and
- (5) *“the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”*
- 3.5 It is necessary to identify the relationships between the Villages Plan and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.
- 3.6 There are a comparatively small range of relevant plans, policies and programmes that shape the policy context in which the Villages Plan is being prepared. These have been reviewed in detail as part of the SA of the East Devon Local Plan, and the most relevant for the Villages Plan specifically are summarised below. A table listing all of the plans, policies and programmes is included in **Appendix 3**.
- 3.7 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the “SEA Directive”) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”) are particularly significant as they require SEA and Habitats Regulations Assessment (HRA) to be undertaken in relation to the Villages Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental

effects (including on European-level nature conservation designations) are identified and can be mitigated. The South East Devon European Site Mitigation Strategy focuses on the likelihood of significant effects to the nature conservation interest at Exe Estuary SPA, Dawlish Warren SAC and the East Devon Pebblebed Heaths SAC/SPA, as a result of recreation arising from new residential development.

- 3.8 There are a wide range of other relevant EU Directives, such as the Water Framework Directive 2000, which seeks to protect inland surface waters, transitional waters, coastal waters and groundwaters, most of which have been transposed into UK law through national-level policy, and in particular the NPPF. At a more local level there is a South West River Basin Management Plan, a Flood Risk Management Plan and Devon County Council have produced a Local Flood Risk Management Strategy, alongside Sustainable Drainage Systems (SuDS) Guidance for new development across the County.
- 3.9 There is a management strategy for the East Devon Area of Outstanding Natural Beauty, which 'washes over' much or all of the settlements of Beer, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury and Uplyme. The Dorset and East Devon World Heritage site (WHS) includes the coast at Beer and the WHS Management Plan is therefore relevant. Conservation Area Appraisals are available for Beer, Broadclyst, Colyton, East Budleigh, Kilmington, Lympstone, Musbury, Sidbury, Whimble and Woodbury.
- 3.10 The Villages Plan must be in line with national policy as set out in the NPPF and its accompanying National Planning Practice Guidance, and will also need to be in conformity with the adopted East Devon Local Plan. The Local Plan advises of definition of Built-up Area Boundaries falling to the Villages Plan but actually has the full suite of written policies that will be applicable to these boundaries. The Local Plan makes clear that although BUABs will be defined in the Villages Plan, they will not have land specifically allocated for development.
- 3.11 A number of Neighbourhood Plans are being prepared by the communities affected by the Villages Plan. At the time of 'publication' of the Villages Plan, of the villages listed in Local Plan Strategy 27, one Neighbourhood Plan (at Lympstone) had been 'made'.

Baseline Information

- 3.12 Baseline information provides the context for assessing the sustainability effects of proposals in the Villages Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends. Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.
- 3.13 Baseline information for the whole of East Devon District has been collated and regularly updated throughout the SA of the East Devon Local Plan and has been consulted on as part of that SA process. The Villages Plan will apply to

geographically discrete areas of the District, but does not seek to promote development in addition to that set out in the adopted Local Plan. Key baseline information about the settlements covered by the villages plan specifically is summarised below.

3.14 **Biodiversity, fauna and flora** - In partnership with Natural England, the Council and its neighbouring authorities of Exeter City Council and Teignbridge District Council have determined that housing and tourist accommodation developments in some parts of their areas will in combination have a detrimental impact on the Exe Estuary SPA and East Devon Pebblebed Heaths Special Area of Conservation (SAC). Impacts from recreational use by property occupants will be critical. Mitigation is required from developments within 10 km of these European sites and some villages in the plan fall within 10 km of one or both sites; namely Broadclyst, Clyst St Mary, East Budleigh, Feniton, Lymptone, Newton Poppleford, Sidbury, West Hill, Whimble, Woodbury. The three Councils have prepared the South East Devon European Site Mitigation Strategy which sets out a joint approach to mitigating the potential significant effects on the SAC and SPA including delivery of suitable alternative natural greenspace (SANGs). These SANGs seek to encourage dog walking and other recreation activity away from the sensitive European sites. Development in Beer and Colyton, and possibly other villages, may affect the Beer Quarry and Caves SAC, particularly the commuting/foraging routes and bat sustenance zones. The River Axe SAC could also be subject to adverse impacts arising from development. The following SSSI's are also relevant:-

- Sidmouth to Beer Coast (Beer, Sidbury)
- Beer Quarry and Cave (Beer and Colyton)
- Exe Estuary (Clyst St. Mary, Woodbury)
- River Axe (Colyton, Kilmington, Musbury)
- Bolshayne Fen (Colyton)
- Otter Estuary (East Budleigh)
- East Devon Pebblebed Heaths (East Budleigh, Greendale, Hill Barton, Clyst St. Mary, Newton Poppleford, Sidbury, Whimble, Woodbury)

3.15 As well as sites with national designations there are also a wide range of important wildlife sites of local interest and protected species and their habitats across East Devon, including in and at villages. Such species and habitats could be vulnerable to adverse impacts from development.

3.16 The **population** sizes of the parishes within which settlements covered in the villages plan fall vary from around 3,800 in Woodbury to 543 in Musbury. The population of the parishes concerned generally rose between the 2001 and 2011 census, with the highest growth rates being in Lymptone (+16.65%) and Uplyme (+10.01%). The only parishes to lose population over this period were Beer (-4.5%) and Musbury (-1.2%). Since the 2011 census planning permission have been granted for significant numbers of additional dwellings, particularly in Lymptone and Woodbury. The **health** of the human population is generally high, with 89% of the residents of Woodbury

describing their health as good or very good in the 2011 census and the lowest figure being 77% in Sidbury (this does include the town of Sidmouth).

- 3.17 A high proportion of **jobs** are in the tourism sector, which is often poorly paid seasonal work with limited opportunities for training and progression. Many better paid residents commute to jobs beyond the district boundary, particularly in Exeter.
- 3.18 With regards to **transport** issues, car use for travelling to and from work is marginally higher in East Devon than the national average, and public transport use is significantly lower. Some of the Villages are accessed by remote lanes (e.g. Whimble, Feniton, Beer), whilst others are adjacent to main 'A' roads (Clyst St Mary, Musbury, Sidbury). There is a 1-2 hourly bus service from most of the Villages to larger settlements where a greater range of jobs, services, and facilities can be accessed. Feniton and Whimble have train stations on the Exeter – Waterloo line.
- 3.19 In respect of **water** matters there are **flood risk** zones in all of the settlements covered by the Villages Plan except Feniton, although Feniton is affected by surface water flooding. Feniton and parts of Whimble are covered by 'critical drainage area'. All settlements will have some level of risk from surface water flooding and minor watercourses should be taken into account with any development through a robust drainage strategy that promotes SuDS. Flooding issues may be relevant to specific policies and the spatial extent of policy boundaries. A significant number of waterbodies in East Devon are currently failing to meet the objective of the Water Framework Directive for Good Ecological Status, with the majority being considered as 'moderate'. The Villages of Newton Poppleford and East Budleigh overlay Source Protection Zones.
- 3.20 **Climate change** is likely to mean warmer, wetter winters; hotter, drier summers; and more frequent extreme weather events. This is likely to result in changes to some of the settlements concerned and the baseline data will need to be reviewed through plan monitoring to ensure that they adapt and can remain sustainable.
- 3.21 **Soil** - The quality of agricultural land around the settlements covered by the plan varies and the quality of agricultural land may affect the development of some policies, although the Villages Plan is not seeking to allocate sites for development and no policies that affect agricultural land have been identified. Areas of moderate or better land (Grade 3 or higher) is adjacent to all Villages, with excellent (Grade 1) land around Broadclyst, Clyst St Mary, East Budleigh, Feniton, Lypstone, and Newton Poppleford.
- 3.22 Information on **coastal change** may be relevant to Beer and also water quality on the River Axe in Colyton, Kilmington and Musbury. The villages of Beer, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury and Uplyme are within AONB's where the need to protect the **landscape** is a particularly important issue.
- 3.23 **Cultural heritage including architecture and archaeology** - Beer, Broadclyst, Colyton, East Budleigh, Kilmington, Musbury, Sidbury, Whimble and Woodbury have conservation areas. There are around 650 Listed Buildings in the parishes covered by the settlements involved, although this includes buildings outside of the Villages Plan area. The largest concentration of Listed Buildings is within the historic core of Colyton with notable concentrations in the historic cores of Broadclyst, East Budleigh, Sidbury, Whimble and Woodbury. No historic assets within the settlement boundaries

are on the Historic England 'Heritage at Risk' register (although this only includes Grade I and Grade II* Listed Buildings and Grade II Places of Worship). There are no **air** quality management areas in the Villages plan area (within, adjoining or close to any of the villages that the plan will cover). All of the settlements currently have sufficient **material assets**, in the form of local services and facilities, to meet the day to day needs of residents, although some settlements have many more than others, notably Beer and Colyton.

Key Sustainability Issues

- 3.24 The key sustainability issues for the Villages Plan, as set out in the initial consultation, mirror those that feature in the Local Plan Sustainability Appraisal and are reflected in the subsequent SA objectives. However, it is noted that in feedback to consultation that reference has also been made to the need to protect geodiversity and to consider the potential impacts of climate change over the plan period and how villages can remain sustainable in the future. Reference is also made to avoiding (rather than just considering) impacts of development on heritage assets and their settings and to the East Devon Pebblebed Heaths Special Protection Area (SPA) and the impact on it from all residential development, including increased bird predation from domestic cats.
- 3.25 The key sustainability issues for the Villages Plan are presented in **Table 4** below with commentary, in the second column, provided on the likely or possible outcomes in the absence of the Villages Plan. For the purposes of this exercise it is assumed that in the absence of the Villages Plan there would be less potential to facilitate future development at these settlements, due to the restrictive nature of Local Plan policies relating to development in the countryside. Nevertheless, the Local Plan identifies the villages as having a range of accessible services and facilities to meet day-to-day needs of residents. The definition of Built-up Area Boundaries at the Villages provides the opportunity to better manage development proposals in terms of scale and location.

Table 5: Key Sustainability Issues and Likely Evolution without the Villages Plan

Key Sustainability Issue	Likely evolution without the Villages Plan
<p>Biodiversity, geodiversity and flora and fauna -</p> <p>Specifically focussing on the importance of protecting wildlife and habitats (in particular the Exe Estuary SPA, East Devon Pebblebed Heaths SAC, Beer Quarry and Caves SAC, River Axe SAC).</p>	<p>Without the Villages Plan, and the clarity it provides over areas that in principle are suited to development, there would be a real concern that negative impacts could arise. Whilst sites with statutory protection are afforded strong Local Plan protection many other sites that are still of value could be vulnerable to loss or damage from development.</p> <p>The ability to define a policy boundary, rather than responding to applications in the absence of a boundary, provides scope to take into account relevant wildlife sites and features in boundary definition.</p>

Key Sustainability Issue	Likely evolution without the Villages Plan
<p>Population – Noting past modest population increase for most villages, although there was a 4.5% decline in Beer’s population which may be due to increased use of the housing stock by second home owners/as holiday lets. Higher than average elderly population. High house prices in proportion to wages and lack of affordable housing</p>	<p>The absence of the Villages Plan could lead to population decline due to the restrictive nature of Local Plan policies for proposals in the countryside. Lack of additional housing provision could increase house prices and exacerbate the ageing population profile in Villages as young people move elsewhere to find work/more affordable home. The provision of boundaries in the plan provides a policy tool that, to some degree, manages scales of housing growth and therefore informs possible future population levels. However on the issue of holiday/second homes the boundaries will have lesser impact; other factors (many outside of the control of planning) will be the key determinants.</p>
<p>Human health – In the villages health levels tends to be better than in the nearby towns and the baseline data gives no grounds for concern on this issue.</p>	<p>It is not envisaged that the presence or absence of the Villages Plan, and Built-up Area Boundary definition, would have significant overall impacts on health levels. Therefore, the trend for relatively better health in villages is likely to continue.</p>
<p>Soil – Potential loss of farmland is seen as the key concern.</p>	<p>The restrictions provided by Local Plan policies relating to development in the countryside should limit the loss of farmland around Villages.</p>
<p>Water and climate change factors – Water quality issues and potential for flooding are relevant to some villages.</p>	<p>The risk of flooding is likely to increase due to climate change. Although additional development is likely to be limited, a potential concern could be the downstream impacts on flowing of surface water run-off generated from ad-hoc development not served by technically robust SuDS.</p>
<p>Air – Air quality concerns (with possible very limited localised exceptions) are not seen as a significant factor at villages.</p>	<p>The only potential for significant change, in the absence of a Villages Plan, is if large scale or clearly polluting developments were to come forward. Given general Local plan policy (and more wide spread protection) this is unlikely at the villages, so air quality concerns are unlikely to occur.</p>

Key Sustainability Issue	Likely evolution without the Villages Plan
<p>Material assets – In more remote rural areas, including the Villages, geographical isolation is a key contributing factor to deprivation. Maintaining and enhancing services and facilities such as shops and medical facilities is seen as the key consideration.</p>	<p>Restrictions on development in the countryside may make it more difficult to support services and facilities in the Villages, particularly with the absence of a policy that could otherwise seek to resist loss of such facilities in the largest villages.</p>
<p>Cultural heritage including architectural and archaeological heritage – Specifically noting concerns around possible adverse impacts on built heritage assets.</p>	<p>The NPPF and Local Plan policies should continue to preserve and enhance heritage assets. The Villages Plan can ensure these assets are taken into account when defining Built-up Area Boundaries.</p>
<p>Landscape – All of the villages are flanked by attractive landscapes and a large number are located in the East Devon AONB where national and local plan policies apply.</p>	<p>NPPF and Local Plan policies should continue to preserve and enhance the landscape, but the Villages Plan can ensure this is considered in defining Built-up Area Boundaries.</p>
<p>Transport – Levels of private car use are high and levels of public transport are significantly lower than the national average.</p>	<p>Ongoing poor provision and use of public transport may cause the Villages to become increasingly isolated in terms of access to jobs, services and facilities. The Villages Plan can mitigate this impact by considering access to services and facilities when defining Built-up Area Boundaries.</p>
<p>Economic growth - High proportion of employment opportunities in tourism; and many better paid residents commute elsewhere to work, particularly to Exeter</p>	<p>Tourism is likely to remain a key employer, which may leave parts of the district vulnerable to any structural changes in the economy. Limited employment opportunities would mean that commuting is likely to remain high, with associated issues of traffic congestion and air pollution.</p>

3.26 **Interrelationships between topics** – as a consequence of the Villages Plan the sustainability issues table above will interact with one-another. For example, because the Villages Plan will have the potential to influence whether new housing will be accessible on foot to **material assets** it is likely to affect the lifestyle choices of future occupants to walk to local services and facilities, which could in turn lead to improvements in **human health, air quality** and **climatic factors** due to reduced emissions.

4 Sustainability Appraisal of Reasonable Alternatives

- 4.1 This section sets out the SA findings for the BUAB definition options, retail policy boundary options in Beer and Colyton, and whether to allow further development at Greendale and Hill Barton Business Parks. Information is provided about the options that were considered, including those suggested in consultation responses, and the reasons for selecting the options that were taken forward from the Consultation Draft and rejecting others. This section goes on to state how this work has been taken forward in the policies in the East Devon Villages Local Plan, which is discussed in more detail in Chapter 5.

The Role of Built-up Area Boundaries for Villages

- 4.2 The adopted East Devon Local Plan advises that Built-up Area Boundaries will be defined for 15 key villages through the Villages Plan (this 'villages' definition includes the town of Colyton). In much simplified terms, many forms of development will, in principle, be acceptable inside boundaries but outside of boundaries greater constraints to development will exist. The contrast between development being acceptable inside boundaries but not outside is most stark in respect of new housing development. New housing accounts for most new development in the plan area so comments in the options appraisal relate most fully to new housing growth. However it should be noted that being outside of a Built-up Area Boundary does not place a blanket ban on new residential development. Affordable housing can be permissible under local plan policy outside of boundaries (schemes can include a mix of affordable and open markets homes) and there is scope in policy for new agricultural dwellings and some new dwellings may be formed through building conversion or exceptionally may otherwise be permissible.
- 4.3 Under adopted Local Plan policy the Built-up Area Boundaries are also of relevance to non-residential uses and, whilst they provide a clear policy steer towards development being preferred within BUAB's, there is greater policy flexibility for new non-housing uses outside of them.
- 4.4 It should also be noted that local communities can bring forward Neighbourhood plans that can define Built-up Area Boundaries and/or include other policies to bring forward development. Typically it is expected that Neighbourhood Plan policies will complement those of the adopted Local Plan and in due course the East Devon Villages Plan. But where based on local evidence and more detailed assessment Neighbourhood Plans can superseded policy in District Council plans.
- 4.5 The following **Table 6** sets out the likely or potential impacts arising from development with a clear policy approach to defining Built-up Area Boundaries in comparison to not having boundaries and having a more ad-hoc approach to where development at villages may occur. This 'ad-hoc' reference, amongst other matters, is assumed to provide for a greater dispersal of development.

Table 6: Potential Sustainability Effects of defining Built-up Area Boundaries

SA Objective	Potential Sustainability Effects of defining Built-up Area Boundaries
1. To ensure everybody has the opportunity to live in a decent home.	Relevant policies of the adopted East Devon Local Plan would still, to some extent, provide for Village housing development, as might Neighbourhood Plans. However through the Villages Plan there will be greater clarity about where development should and should not go and it will focus development into appropriate areas. Furthermore the act of defining a boundary on a map could help to secure sites specifically for affordable housing, outside of the boundary and under exceptions test, by removing/diminishing full open market hope value.
2. To ensure that all groups of the population have access to community services.	The Villages Plan, and options for Built-up Area Boundary definition, will be able to take into account where facilities are located and seek to ensure that boundaries are defined, and therefore scope for development falls within, areas that enjoy ease of access to facilities. This is particularly so in respect of pedestrian access. Without such a policy approach future development could be more randomly distributed or might not come forward at all.
3. To provide for education, skills and lifelong learning	The Villages Plan, and options for Built-up Area Boundary definition, will probably not have significant impacts on this objective though it could help facilitate new provision by giving greater certainty in respect of where development may be allowed. In the absence of the boundaries the certainty may be lost and facilities not provided.
4. To improve the population's health	The Villages Plan, and options for Built-up Area Boundary definition, can, in particular, define boundaries so that development falling within them is accessible by pedestrians to and from facilities. In the absence of rationally defined boundaries development could be more dispersed and in locations where facilities are not easily accessible by pedestrians and therefore the health benefits of encouraging walking could be lost.
5. To reduce crime and fear of crime.	The Villages Plan, and options for Built-up Area Boundary definition, are not seen to be significant in respect of this objective.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. Defining Built-up Area Boundaries could lead to some negative effects in respect of this objective.
7. To maintain and improve cultural, social and leisure provision.	The Villages Plan, and options for Built-up Area Boundary definition could help facilitate new provision by giving greater certainty in respect of where development may be allowed. In the absence of the boundaries the certainty may be lost and facilities not provided.
8. To maintain and enhance the historic environment, heritage assets and their settings.	The Villages Plan, and options for Built-up Area Boundary definition, will provide scope to consider historic buildings and their settings, but these issues are fully covered by the policies of the Local Plan. There is potential for negative effects depending upon the specific location and design of new development.

SA Objective	Potential Sustainability Effects of defining Built-up Area Boundaries
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	The Villages Plan, and options for Built-up Area Boundary definition, will provide scope to consider landscape issues, plot sizes and open spaces. Without the Villages Plan development could come forward in a far more ad-hoc manner and as such could be damaging to landscape character and not promotes wise use of land. There is potential for negative effects depending upon the specific location and design of new development.
10. To maintain the local amenity, quality and character of the local environment.	Without the Villages Plan there will not be a clear policy to determine appropriate and best locations for future development. The Villages Plan, and options for Built-up Area Boundary definition, will provide scope to afford relevant protection whilst also allowing for appropriately located development to come forward. There is potential for negative effects depending upon the specific location and design of new development.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	The Villages Plan, and options for Built-up Area Boundary definition, will help to restrict ad-hoc development around the defined plan settlements. The absence of boundaries could result in unplanned or less planned development and that could give rise to greater adverse impacts. There is potential for negative effects depending upon the specific location and design of new development.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	Pedestrian accessibility to facilities can be a specific factor taken into account in boundary definition. The adopted Local Plan does, through its policy, direct development to those towns and villages that do have a good range of facilities and public transport. In so doing the Local Plan will, in broad terms, help establish patterns of future growth that offer pedestrian accessibility to facilities or public transport and where journey lengths to access facilities will be shorter and hence more likely to encourage cycling. Boundary definition for villages can build on this approach but if boundaries are not defined and more ad-hoc or dispersed development patterns were the outcome a potential result could be greater car dependence.
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.	The definition of Built-up Area Boundaries at Villages offer the scope, in comparison with a potential more ad-hoc pattern and scale of development in the absence of boundaries, to afford fuller protection to air, soil and water. There is potential for negative effects depending upon the specific location and design of new development.
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	The provision of Built-up Area Boundaries can direct development to certain locations that encourage pedestrian accessibility. In contrast car driving, with transport being a major greenhouse emitter, could be expected to increase if development occurred on a more ad-hoc and dispersed manner in the absence of boundaries.

SA Objective	Potential Sustainability Effects of defining Built-up Area Boundaries
15. To ensure that there is no increase in the risk of flooding as a result of development.	Boundary definition provides most certainty, whereas less control would be achieved through a more ad-hoc approach to allowing or providing for development, although flooding issues are dealt with through the policies of the Local Plan.
16. To ensure energy consumption is as efficient as possible.	There are probably few differences between having and not having a boundary in respect of this objective other than those relating to transport that are already discussed.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	There are probably few differences between having and not having a boundary in respect of this objective, although new development may provide opportunities to establishing more sustainable waste management practices and the re-use of existing buildings and development of brownfield sites in the BUAB could have positive effects.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	There are probably few differences between having and not having a boundary in respect of this objective, though more development may provide for some job growth, albeit it might not be accessible for non-car users.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	The definition of BUABs leading to the acceptance of development in principle might generate more consumers to support services and facilities. This presupposes that they would choose to use local services; if new residents were beyond walking distances to facilities and had to/chose to use cars they may drive to bigger service centres to access facilities.
20. To encourage and accommodate both indigenous and inward investment.	The definition of BUABs could lead to more development which could be expected to have economic benefits.

4.6 The above table illustrates that defining Built-up Area Boundaries in a logical manner affords scope to secure positive sustainability benefits relating to social and economic objectives, whilst seeking to avoid negative impacts. There is potential for some negative effects upon environmental objectives depending upon the specific location and design of new development, although mitigation should minimise these.

Description of Reasonable Alternatives for Built-up Area Boundaries – Strategic Options

4.7 The SA of the Villages Plan has initially considered four ‘strategic’ options for Built-up Area Boundary definition for the East Devon villages, which set out an overall approach for identifying BUABs across all Villages. The four Strategic Options are described below.

4.8 **Option 1 – Use the existing core built form to define boundaries** – this approach might be seen as maintaining something of mid ground perspective with infill

development coming forward inside boundaries of the existing built form of the Villages. In respect of this approach to boundary definition officers of the Council worked up a detailed methodology to determine the types and characteristics of areas that should or should not be inside boundaries.

- 4.9 **Option 2 – Apply Option 1 but as an additional variant to also look at pedestrian accessibility to facilities** - this approach can be seen as a variant on Option 1. The Option 1 approach looks at existing built form to determine where boundaries are defined but not how accessible facilities are to differing areas of land within the area of built form. This approach examines pedestrian accessibility, specifically including for those that may have some form of mobility constraint, such as wheelchair users, or are parents/carers pushing buggies, to core village facilities. As a starting point an 800 metre walking distance to schools, shops, village halls and other facilities was mapped out and then this was refined to look at such issues as quality or in some cases absence of footpaths, steepness of routes and safety concerns. The outcome of this approach would be to have boundaries, in some cases, that may exclude areas that would otherwise fall within boundaries under Option 1 and it should therefore be seen, in part, as a more constraining approach but one that focuses the growth that would be acceptable on or into areas that are close to facilities. See also Option 3 below.
- 4.10 **Option 3 – Draw boundaries more tightly than the core built form with the explicit intent to reduce levels of development** – this approach would be explicitly seen as one that seeks to place greater constraints on village development and as such reduce scope for extra building work, especially the number of homes built. At this stage we have not sought to define a methodology for how tightly boundaries could be defined or drawn. In the assessment the assumption is made, however, that boundaries would be substantially more tightly drawn than Option 1 and therefore include far less land. Whilst such an approach to boundary definition is not inevitable it does help illustrate potential differences in sustainability outcomes.
- 4.11 **Option 4 – Draw boundaries that are larger than the core built form to accommodate more village development** – this approach would depart, in part or wholesale, from the proposed methodology and draw boundaries that include more land (perhaps substantially more land). At this stage we have not sought to define a methodology for how larger boundaries could be defined or drawn but it is relevant to note that the adopted Local Plan, under Strategy 27, advises that the intent is not to allocate land for development at villages. Drawing enlarged boundaries could by default lead to the quasi-allocation of land and would lead to scope for more development at villages. In the assessment the assumption is made that boundaries would be substantially bigger/encompass more land than Option 1. Whilst such an approach to boundary definition is not inevitable it does help illustrate potential differences in sustainability outcomes.

Description of Rejected Alternatives for Built-up Area Boundaries – Strategic Options

- 4.12 The above four 'strategic' options are the relevant and appropriate choices to feature in the appraisal. Whilst other strategic options might theoretically be possible, these options are established on the basis that the Local Plan clearly advises that Built-up

Area Boundaries will be defined at the identified 15 Villages. Strategic options or approaches to village policy that are not considered to represent ‘reasonable alternatives’ are:

- 4.13 **Not have boundaries but instead have a criteria based approach to determine acceptability of schemes for development** – this approach would clearly depart from Local Plan (adopted January 2016) that explicitly advises that boundaries will be defined at the 15 Villages. We have not sought to establish what a criterion based policy would, could or might seek to say and do, but at this stage this approach is rejected as it is clearly not compliant with the adopted Local Plan and is therefore not a reasonable alternative.
- 4.14 **Not have a methodology to define boundaries but rely on some other process** – under this approach there would not be a specified logic to defining boundaries but they would otherwise be established – perhaps we could, for example, ask Parish Council’s to define them – but they might ask us to suggest an approach or methodology to apply. Appraising this approach would seem difficult or impossible because there would be nothing to indicate what the possible outcomes could be (such as overall levels or amounts of possible development or locations for that development).
- 4.15 **Do Nothing** – a further theoretical approach is a do nothing option. The Local Plan advises that boundaries will be determined in the Villages Plan⁶ so it is not regarded as being a realistic option to do nothing. Nevertheless, the Council has appraised the likely evolution without the plan, consistent with SEA Regulations (Table 5).

Appraisal of the Strategic Options for Built-up Area Boundary definition

- 4.16 **Appendix 4** contains the SA matrix of the four Strategic Options, whilst the following table provides a summary of the SA scores.

Table 7: Summary of SA scores for the Strategic Options

SA obj.	Option 1 – Core features to define boundary	Option 2 – Core features plus Pedestrian accessibility	Option 3 - Tighter Boundaries	Option 4 – Larger Boundaries
1: Homes	+	+	-	++
2: Services	+	++	+	-
3: Education	0	0	0	0
4: Health	+	++	+	-
5: Crime	0	0	0	0
6: Noise	0	0	0	0
7: Culture	0	0	0	0
8: Heritage	0	0	0	0
9: Landscape	0	+	+	--
10: Amenity	0	0	0	0
11: Biodiversity	-	-	0	--
12: Transport	0	++	+	--
13: Air, soil, water	0	0	0	0

⁶ The SA of the Local Plan considered an alternative to not define BUABs, and concluded this was not the preferred approach.

14: Climate	-	0	0	-
15: Flooding	0	0	0	0
16: Energy	0	0	0	0
17: Waste	0	0	0	0
18: Employment	0	0	-	+
19: Vitality	+	+	0	+
20: Investment	0	0	-	+

- 4.17 The above table shows that there are comparative sustainability pros and cons to all the differing approaches to defining Built-up area Boundaries. In principle, the identification of a BUAB (to whatever scale) can help facilitate development, as it establishes areas that are considered appropriate through strategic policy to accommodate growth and development (Local Plan Strategy 6).
- 4.18 In a very general sense approaches to boundary definition that seek to place the greatest limits on village development, this more than anything else means housing development, score most highly in respect to the environmental and to some degree social dimensions of sustainable development. The positive social sustainability outcomes are typically greatest where new homes will be close to facilities and this will enable residents of new dwellings to walk to these facilities. Option 2 (pedestrian accessibility focused) scores similarly to Option 1 (using core built features to define boundaries) for most sustainable development considerations but with its specific focus on the importance of pedestrian accessibility it can be seen as a general refinement over Option 1.
- 4.19 In respect of potential economic sustainability benefits it is the options that provide for greater levels of development (specifically Option 4 – larger boundaries) that offer the greatest economic benefits though it is relevant to note that increased population levels do not automatically mean greater vitality and viability for that specific village. If new residents of a village are car dependent, for example, they may choose to drive to nearby major centres for goods and services rather than to those in a village. It should also be noted that whilst an increased catchment population in a village may support some services, to some degree, it can be expected to frequently be the quality of the service or product or levels of passing trade that are key to success. More detailed commentary on the options is provided below.
- 4.20 **Option 1 – Use the existing core built form to define boundaries** – generally has what could be summarised as mostly neutral sustainability impacts though with positives (though not significant positives) associated with provision of new homes and accessibility of homes to facilities, for encouragement of walking and promoting the vitality of villages (objectives 1, 2, 4, 19). The two possible negatives identified (though not significant negatives) are in respect to biodiversity (Objective 11) and greenhouse gas emissions (Objective 14) by allowing/providing for village development in general. In respect to greenhouse gas emissions negative impacts would be in comparison with development in towns (where there are more facilities and typically less car dependency) and also noting that some parts of villages are beyond comfortable walking distance to facilities and therefore likelihood of car use is greater.
- 4.21 **Option 2 – Apply Option 1 (use existing core built form to define boundaries) but as an additional variant to also look at pedestrian accessibility to facilities** - this approach is similar in many respect to Option 1 in respect of general neutral

impacts. However, a number of the just positives in Option1 become significant positives under this option. Option 2 specifically seeks to accommodate new development, specifically new housing, in locations that are accessible by pedestrians and as such has significant positive benefits in respect of access to facilities (Objective 2) and health (Objective 4). Encouraging non-car based mode of travel (Objective 12) also scores a significant positive.

- 4.22 **Option 3 – Draw boundaries more tightly with the explicit intent to reduce levels of development** – this approach also has a number of neutral sustainability impacts. Its positives (though not significant positives) are similar to option 1, specifically relating to pedestrian accessibility to services and health (Objectives 2 and 4). It does, however, have negative (though not significant negative) impacts. Negatives include in respect of limiting housing supply (Objective 1) compared to the other options, and therefore availability of homes for people to live in, and specifically economic benefits (Objectives 18, 20) that arise through building more new houses.
- 4.23 **Option 4 – Draw boundaries that are larger to accommodate more village development** – this approach in many respects shows the opposite types of sustainability impacts than the other options, though with a number of significant negatives. On the positive side this option is likely to deliver the most new homes and as such scores a significant positive against the objective of providing homes for people to live in (Objective 1). It also sees positive impacts, because it results in more development (specifically house building) in respect of economic objectives (Objectives 18, 19 and 20). It is, however, the one option that generates potential significant negative impacts. These are in respect of potential for adverse impacts arising, if boundaries are drawn very loosely, on land that may be of conservation value so could result in adverse landscape impacts (Objective 9) and biodiversity impacts (Objective 11) and also promoting greater car use (Objective 12). Although policies in the NPPF and the Local Plan would provide a degree of mitigation, the principle of development would be accepted if land is identified in the BUAB.

Reasons for selecting the preferred option

- 4.24 Overall, **Option 2** performed best in the SA, and is taken forward as the preferred option. The effects of Option 2 on the SA objectives are broadly more positive than the other three scenarios. Whilst this approach is not the most desirable for all sustainability objectives, less so for the economic objectives, it does in other respects score more highly than other options with fewer clear negatives. Looking forward, and most likely relevant to plan review in the years ahead, there may be scope to refine Option 2 to inform choices of land that could be suitable for allocation of development at villages.
- 4.25 Option 2 seeks to accommodate new development, specifically new housing, in locations that respect the core built form, minimising adverse impacts upon landscape character. This option ensures facilities and services are accessible by pedestrians and, as such, has significant positive benefits in respect of access to facilities, and health. Encouraging non-car based mode of travel also scores a significant positive.
- 4.26 Option 1 performs similarly to Option 2, but is not taken forward as it does not incorporate consideration of accessibility to services. Option 3 is not preferred as it

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

Reasonable alternatives for BUABs at the Villages and Reasons for selecting the preferred option

Background

- 4.27 As explained above, Strategic Options have been considered in setting an overall approach for defining BUABs across all Villages. Following on from this, in considering possible Built-up Area Boundaries for each village, work initially looked at the overall built form of development in the 15 villages. On this basis early consideration for the BUABs emerged using a criteria-based approach, ensuring consistency with the NPPF and Local Plan policies. The full methodology to help determine where Built-up Area Boundaries should be drawn is in Appendix 5. This methodology was applied to each Village to consider the extent of the BUAB in detail, and informed the ‘reasonable alternatives’ that should be subject to SA. The detailed, site by site analysis of each Village can be seen [here](#)
- 4.28 The establishment of the Strategic Options (1-4) described above, alongside an accompanying criteria-based methodology for BUAB definition at each Village, negates the need for an SA of (potentially numerous) minor BUAB options – such detailed SA would be disproportionate, given the strategic nature of Sustainability Appraisals. The preferred Strategic Option (2) means that alternatives that are outside the core built form and beyond pedestrian accessibility can generally be excluded.
- 4.29 As previously explained in Chapter 2, Stage B, only “reasonable alternatives” that are sufficiently distinct need to be subject to SA, not every possible alternative. One must also take into account the objectives of the Plan when considering reasonable alternatives, and it is clear that the intention of the Villages Plan is to identify BUABs, and is not seeking to allocate land for further development.
- 4.30 The Consultation Draft Villages Plan (August 2016) included reasonable alternatives for seven of the Village BUABs (Beer, Clyst St Mary, Feniton, Musbury, Newton Poppleford, Uplyme, West Hill), informed by the criteria assessment described above and other factors such as walking distances.
- 4.31 Alternatives that have been suggested in consultation on the Draft are also highlighted, although the majority of the sites suggested for inclusion in the Village BUABs are small-scale and the likely significant effects would be the same as the proposed BUAB (as discussed in Chapter 5 and detailed in Appendix 4). They are not a different way of fulfilling the objectives of the plan, and are not sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made; therefore they do not constitute “reasonable alternatives”. The exception is a site put forward for inclusion to the north west of Feniton BUAB, comprising some 31 hectares of land – this has been subject to SA given its large scale and different sustainability implications. Several other relatively large sites were also suggested (e.g. 7-8ha site in West Hill; site with potential for 83 dwellings,

land east of Feniton), but these would not be consistent with preferred Strategic Option (2) highlighted above.

- 4.32 Maps of the BUAB and reasonable alternatives can be seen in Appendix 4, alongside the SA matrix of Villages where alternatives exist.
- 4.33 In addition, consultation responses advocated further growth at Greendale and Hill Barton Business Parks, as the Villages Plan only identified the extent of authorised business uses. These sites are not within the BUAB (contrary to Local Plan Strategy 6) and Local Plan Policy E7 Extensions to Existing Employment Sites does not apply at these two sites; therefore further growth would not be fully consistent with the adopted Local Plan. Despite this, given the consultation responses and national policy⁷ that places significant weight on the need to support economic growth through the planning system, growth at these two business parks is considered a reasonable alternative to appraise.
- 4.34 During the Examination of the Villages Plan, the Inspector considered that a policy should be introduced to the Villages Plan that links the Built-up Area Boundaries shown on the inset maps to the adopted Local Plan policies. This is a specific policy requested by the Inspector to make the plan 'sound', and there are no 'reasonable alternatives' to the policy (VP01) that would achieve this outcome. As explained above, the strategic approach to BUABs and their specific delineation at the Villages have considered reasonable alternatives, and the sustainability findings of policy VP01 itself are explained in chapter 5 and appendix 4.

Beer

- 4.35 An alternative approach excludes an area in the western part of the Village from the BUAB. The significant effects of this alternative are likely to be the same as for the preferred BUAB as this area is relatively small, still within reasonable walking distance of the village centre (albeit there is a steep gradient which may deter some pedestrians/cyclists), and there are no additional environmental effects. This alternative was not preferred because of a desire to include the built form, and there was no significant reason not to do so. Therefore, the preferred approach is to include this alternative area of land in the western part of the village.
- 4.36 Through consultation (August-September 2016) additional sites were suggested for inclusion in the BUAB on the periphery of Beer. These have been included where consistent with the assessment methodology (built-out sites related to the settlement). Suggested sites that were not consistent with the methodology and so were excluded consisted of built-out sites granted as an exception and a greenfield site which did not reflect the core built form. Therefore, the application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

Clyst St Mary

- 4.37 Due to walking distances to community facilities in the village core of beyond 1km, an alternative to exclude the Local Plan allocated site at Winslade Park was considered. However, the flat topography and presence of pedestrian footpaths mean that it

⁷ National Planning Policy Framework paragraph 19.

would still be reasonable to walk from Winslade Park, and the significant effects of this alternative are considered to be the same as the preferred BUAB.

- 4.38 In consultation on the Draft, a suggestion was made to include a dwelling and a garden on the northern edge of the village, but the garden is excluded as it could extend the built form of the settlement. St Bridgets Nursery continues to be excluded as it is detached from the settlement. Land at Winslade Park is included where it is in the Local Plan allocation, but recreation areas and land outside the existing built form are excluded. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

Feniton

- 4.39 An alternative approach to include a BUAB around the 'old' village (in addition to the new village) was considered. This option is less favourable due to a lack of community facilities on the old village, poor pedestrian links to the facilities and train station in the new village, and the presence of designated heritage assets in the old village, which has around 15 Grade II listed buildings in and around the village core, and one listed as Grade II*. In all other aspects, the significant effects would be the same as the preferred BUAB.
- 4.40 In consultation on the Draft, a large area of land (31 ha⁸) to the north west of the village (land around Sherwood Cross) was suggested for inclusion in the BUAB. Although this was excluded according to the site assessment criteria as being outside the core built form, given the large scale of the site the sustainability implications are different and it has been subject to SA as an alternative. The SA matrix (Appendix 4) for this alternative shows significant positive effects on housing delivery, but negative environmental effects relating to the historic environment, landscape character, loss of Greenfield and best and most versatile agricultural land, greenhouse gas emissions, and not matching the level of jobs with the economically active workforce. For these reasons, this alternative is not preferred.
- 4.41 A small area of land north of Acland Park was suggested for inclusion as it benefitted from planning permission, and it was agreed to include in the BUAB. Land to the east (including land east of Wainhomes development) was excluded as it is detached from the village and does not reflect the core built form.

Musbury

- 4.42 An area of land including farm buildings at Baxter's Farm, adjoining the south west part of the village, was excluded in the Consultation Draft but was a reasonable alternative to consider. Following consideration of consultation responses, this land has been included as it reflects the built form of the settlement. Land at Mountfield is included in the BUAB despite consultation responses to the contrary, albeit support from the land owner, as it is within the built form. The inclusion of both of these sites in the BUAB has positive SA effects through ensuring new development will be within reasonable walking distance of services in Musbury, allowing small-scale housing to come forward which could support the primary school and other community services. There is potential for some negative effects on noise (presence of traffic along the

⁸ This site could potentially accommodate around 540 dwellings, assuming a net developable area of 60% (advocated in SHLAA methodology).

A358), heritage assets in the village, landscape (located in the East Devon AONB), and biodiversity (River Axe SAC within 1km).

- 4.43 Consultation responses suggested land to the north, but this is excluded as being recreation space and outside the built form. Drakes Farm is excluded as it is detached from the village. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

Newton Poppleford

- 4.44 An alternative BUAB was considered that includes parts of the village to the west of the A3052/B3178 roundabout. This option performs less well for objectives relating to access to community facilities by non-car modes, as it is beyond desirable walking distance and due to the lack of appropriate pedestrian footpaths. It would also bring the BUAB closer to the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, to within approximately 200m, so adverse biodiversity impacts are more likely. In all other aspects, the significant effects would be the same as the preferred BUAB.
- 4.45 Consultation responses suggested sites to the west of the village for inclusion in the BUAB, but these are not included for the reasons highlighted above. Sites were also suggested on land north of the buildings along the A3052, but excluded because it is not within the core built form. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

Uplyme

- 4.46 An alternative approach excludes an area to the south of the village from the BUAB. The significant effects of this alternative are likely to be the same as for the preferred BUAB as this area is relatively small, still within reasonable walking distance of community services in the village centre (albeit there is a steep gradient which may deter some pedestrians/cyclists), and there are no environmental effects in addition to potential impacts upon the East Devon AONB, and biodiversity (Sidmouth to West Bay SAC). This alternative to exclude an area to the south was not preferred because of a desire to include the built form, and there was no significant reason not to do so. Therefore, the area to the south is included in the BUAB.
- 4.47 Following consultation on the draft, some additions to the BUAB were made to include land adjoining to the north west and north east, along with several other smaller amendments in other parts of the BUAB. However, none of these changes were significant enough to justify a separate SA – the effects are the same as identified for the preferred BUAB.
- 4.48 Suggestions to include the camping site at Hook Farm were not pursued as the site is outside the built form. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

West Hill

- 4.49 An alternative BUAB to include all of the 'built form' of West Hill was considered, which included land to the south of the preferred BUAB. This alternative was not preferred due to longer walking distances, along lengths of road with no footpath, which would discourage pedestrians from accessing services that lie to the north of the village. It would also bring the BUAB closer to the East Devon Pebblebed Heaths

SAC and East Devon Heaths SPA, to within approximately 500m, so adverse biodiversity impacts are more likely. A County Wildlife Site would also be adjacent to the south east. For these reasons, this was alternative was not preferred. In all other aspects, the significant effects would be the same as the preferred BUAB.

- 4.50 Further sites on the edge of West Hill were put forward for inclusion in the BUAB through consultation responses, but not incorporated as being outside the core built form of the village or could lead to extending the built form into large curtilages. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA.

Other Villages

- 4.51 In **Lympstone**, at the time of 'publication' of the Villages Plan, the BUAB was already defined in the 'made' Neighbourhood Plan, and it was not considered appropriate to amend this given that it is broadly consistent with the methodology for boundary definition, and the Governments' Planning Practice Guidance advocating that made neighbourhood plans should be taken into account when preparing the Local Plan policies and should avoid duplicating neighbourhood plan policies.
- 4.52 No reasonable alternatives were identified for the other Villages in the Consultation Draft Villages Plan (August 2016), although additional sites were suggested for inclusion/exclusion in consultation responses. The application of the site analysis criteria means that no additional reasonable alternatives arose through consultation that required SA, as discussed below.
- 4.53 Additional sites were out forward in the BUAB at **Broadclyst**, but these were not included as they did not reflect the existing core built form. Recently constructed classrooms at the community college were included as it is related to the settlement, whilst an area to the front of the primary school was excluded as it forms an open space. An orchard was excluded as being a recreation space.
- 4.54 At **Colyton**, the former 'Ceramtec' site was suggested for inclusion in the BUAB during consultation, and this was agreed as it is well related to the settlement. A small area of employment land has been included as it reflects the core built form, whilst suggestions for large tracts of Greenfield land to the north east, east, west, and south west were excluded due to their isolated location, outside the built form.
- 4.55 Sites were put forward to the south east of **East Budleigh** BUAB, but excluded as it is divorced from the core built form. The same issues arose from a site to the south.
- 4.56 In **Kilmington**, a site suggested for inclusion in the BUAB to the north west was excluded as being outside the core of the village and within large residential gardens. An area of land to the rear of the Old Inn was also excluded as not within the core built form, whilst a paddock on Whitford Road was mostly included as it was surrounded on most sides by the core built form.
- 4.57 A site to the south of **Sidbury** BUAB was submitted during consultation, but excluded as being divorced from the built form.
- 4.58 A consultation response to include the allotments in the BUAB at **Whimble** was not taken forward as it is outside the built form and amenity space. Two fields to the

south east are excluded as outside the built form, as is a long strip of land extending from the south.

- 4.59 In **Woodbury**, sites around the BUAB were suggested through consultation, the largest being land at Gillbrook to the south that could accommodate around 25 dwellings, but excluded as being outside the built form.

Greendale and Hill Barton Business Parks

- 4.60 Local Plan policy E7 sets out the criteria for permitting the small-scale expansion of existing employment sites in the countryside. As stated, this policy will not apply at Greendale and Hill Barton Business Parks, and therefore the identification of BUABs or promotion of further growth at these two locations would not be fully consistent with the Local Plan.
- 4.61 Nevertheless, given that consultation responses on the Draft Villages Plan advocated growth, an option to identify BUABs allowing expansion of these two business parks has been subject to SA, along with a 'business as usual' option not to do so. Given the common issues and close proximity of the two business parks, the effects have been incorporated into a single SA matrix (in Appendix 4).
- 4.62 The effects of identifying BUABs and allowing the expansion of the business parks would be significantly positive for encouraging investment and positive through encouraging economic growth, albeit the Local Plan advocates sustainable economic growth at the Towns and West End of the district rather than these two business parks. The SA notes negative impacts upon landscape character, local environment, biodiversity, and greenhouse gas emissions, in identifying BUABs, largely due to their rural location. The location also means significant negative effects would arise from the objective to promote non-car modes of travel.
- 4.63 Resisting the growth of the business parks by not including a BUAB allowing expansion has positive effects relating to environmental objectives on protecting and maintaining landscape character, local amenity, biodiversity, air/soil/water quality, and flood risk. Negligible effects are given for most of the other objectives.
- 4.64 Overall, the option not to identify BUABs allowing expansion at Greendale and Hill Barton Business Parks performs better in the SA for the reasons given above, and is therefore the preferred option. This is reflected in the approach set out in policies VP04 and VP05 – the sustainability findings of these policies are discussed in chapter 5.

Reasonable alternatives for Village/Town Centre vitality Policies at Beer and Colyton

- 4.65 In addition to defining Built-up Area Boundaries, the Villages Plan also includes policies to resist the loss of shops and commercial premises in the centres of Beer and Colyton, given the scale and importance of these centres. These are the largest settlements covered by the Villages Plan and both have core commercial centres that offer a good range of services and shops, their commercial centres are far more significant than all other villages. The detailed SA matrices can be seen in Appendix 4.

- 4.66 The key overarching logic for inclusion of retail/commercial protection policy is to support the commercial vitality of the village centres and to retain a concentration of activity that supports and encourages human activity, visitor levels and business success. In the absence of such policy there is potential for pressure to convert or redevelop commercial premises into higher value non-commercial uses, particularly housing.
- 4.67 Beer and Colyton have far more retail and commercial activity than all other villages featured in the Villages Plan. Both settlements have a core central cluster or business and retail activity located in what are now and were historically the village centres.
- 4.68 A general policy approach throughout the Local Plan is to support and promote commercial activity in core central areas and to resist the loss of such uses to residential development (or occasionally other uses that might not be appropriate in such centres). Given this general objective, SA work has been undertaken examining the issues surrounding the option for inclusion of specific policy for these villages that protects core areas of shops and commercial activity versus not having policy and instead relying on general criteria based policy in the adopted Local Plan only. The SA matrices presented in Appendix 4 are for the following two reasonable alternatives:

Option A – Define a Boundary/Area – under this option a boundary or area would be defined to establish where losses of commercial property would be resisted.

Option B – Do not Define a Boundary/Area – under this approach the general criteria based policies of the Local Plan would still apply to resist the loss of commercial and retail premises. However, in the matrix there is an underlying assumption that such policies would lack the degree of rigour or clout that Option A would provide and as such there would be more potential and likelihood for loss of facilities.

- 4.69 For many of the SA Objectives there are no really significant discernible differences between having a commercial /shopping protection policy. Where a resisting loss policy does have greatest absolute and comparative benefit is in respect of objectives to include:
- Promoting economic vitality (notwithstanding the fact that jobs in building and construction are provided in conversion and redevelopment) (SA objective 18).
 - Encouraging pedestrian accessibility to facilities (objective 12);
 - Promoting social and education activities, through resisting loss of facilities (objective 2); and
 - Affording protection to the build environment (objective 10).
- 4.70 These would need to be considered against the comparative positive benefit of not having a policy and allowing for or encouraging conversion to provide extra housing. Colyton and particularly Beer are important tourist destinations for East Devon where

the vitality of the town/village centre is an important component of the visitor attraction.

- 4.71 Option B, not having a retail policy boundary, could result in more housing, through loss or conversion of shops to residential use, and more new housing development can have some sustainability benefits, including provision of homes, specifically SA Objective 1, and also economic benefits associated with jobs in the construction business.
- 4.72 However, this is outweighed by the adverse impacts that could arise through loss of commercial premises. The present and future operation of the commercial centres ensures that people will have access to facilities, and in Beer and Colyton most residents live within walking distances of the centres. The inclusion of policy therefore directly performs very well against a number of SA Objectives, including 2, 4, 7, 12 and 19. Furthermore many retail properties can be of architectural importance and help define an attractive built environment. Whilst conversions and redevelopment to housing do not inevitably lead to adverse impacts this is often the case. SA Objectives 8 and 10 are concerned with built environment quality and as such absence of policy and protection it affords could result in greater loss through unsympathetic building work. For these reasons, **Option A – Define a boundary/area** performs best in the SA and is recommended as the preferred option – this is reflected in policies VP02 and VP03.

5 Sustainability Appraisal of the Villages Plan

5.1 This chapter sets out the SA findings of the Villages Plan. A summary of the likely significant effects of the Built-up Area Boundaries (BUABs) for each Village are discussed in turn, alongside the overarching policy VP01. The sustainability findings of the village/town centre vitality policies at Beer and Colyton (policies VP02 and VP03), and Greendale/Hill Barton Business Parks are then set out. Reference is then made to possible mitigation measures and recommendations for ways in which to maximise the benefits of the Villages Plan, and minimise any adverse effects.

Village Built-up Area Boundaries

Background

5.2 The East Devon Local Plan 2013-2031 (adopted January 2016) sets out planning policies across a range of issues for the district, including the spatial strategy that directs the location of new development. This was accompanied by an SA Report. Local Plan Strategy 6 states that development is appropriate in BUABs, subject to meeting certain criteria. The BUABs are identified for the Towns in the Local Plan, and Strategy 27 lists the other settlements that will have a BUAB designated through the Villages Plan. Policy VP01 in the Villages Plan re-states the settlements in Strategy 27, and explains how development proposals relating to the BUABs will be considered.

Summary of SA findings

5.3 The detailed matrices of policy VP01 and the BUABs at each Village can be found in Appendix 4, whilst the scores are summarised in table 8 below and discussed in text that follows.

Table 8: Sustainability Appraisal findings for Policy VP01 – Built-up Area Boundaries; and Village Built-up Area Boundaries

SA obj.	Policy VP01	Beer	Broadclyst	Clyst St Mary	Colyton	East Budleigh	Feniton	Kilmington	Musbury	Newton Poppleford	Sidbury	Uplyme	West Hill	Whimble	Woodbury
1: Homes	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
2: Services	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
3: Education	+ ?	+?	++ ?	+?	+	+	+?	+?	+	+	+?	+?	+	+	+
4: Health	+	+	+	0	+	0	0	0	0	+	0	0	0	+	+
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	- ?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?

7: Culture	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
8: Heritage	- ?	- ?	0 ?	0	- ?	- ?	0	- ?	- ?	- ?	- ?	0 ?	0	- ?	- ?
9: Landscape	0 ?	+ / - ?	+ ?	0 ?	+ / - ?	+ / - ?	+ ?	+ / - ?	+ / - ?	+ / - ?	+ / - ?	+ / - ?	+ ?	+ ?	+ ?
10: Amenity	- ?	0 ?	0 ?	-	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	-
11: Biodiversity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12: Transport	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
13: Air, soil, water	0	+	+	-	- ?	+	+	- ?	- ?	+	+	+	+	+	+
14: Climate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15: Flooding	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?	0 ?
16: Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?	+ ?
18: Employment	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0
19: Vitality	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
20: Investment	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0

- 5.4 There are long-term, permanent positive effects from policy VP01 and in identifying the Village BUABs on ensuring that everybody has the **opportunity to live in a decent home** (SA objective 1), through providing a degree of certainty that residential development will be acceptable, in principle, within the BUAB.
- 5.5 The methodology that has been used to delineate the BUABs provides the opportunity to **access community services** (objective 2), by considering reasonable walking distances to such facilities. By definition, the Villages have a range of community services to meet day-to-day needs, although the range is greater at some (e.g. Colyton, Beer). A long term, permanent positive effect is given for policy VP01 and all of the villages.
- 5.6 A positive effect with some uncertainty is present with regards to **provide for education** (objective 3), where the number on the school roll is approaching or exceeding capacity. A significant positive effect (with uncertainty) is given for Broadclyst BUAB due to the presence of primary and secondary schools, ensuring access to education for children of all ages. Policy VP01 and BUABs at the other villages have a positive effect as all contain a primary school with capacity.
- 5.7 Policy VP01 and those villages that contain health care facilities (e.g. doctor's surgery, pharmacy, dentist) are given a positive effect for the objective to **improve the population's health** (objective 4), namely Beer, Broadclyst, Colyton, Newton

Popleford, Whimple, and Woodbury. The delineation of the BUABs ensures that new development should be within reasonable walking distance to these facilities – such activity can help to improve the population’s health. In addition, NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.

- 5.8 None of the Village BUABs are considered likely to have an effect on the objective (5) to **reduce crime and fear of crime**. This issue will be more appropriately addressed by the design of new developments, which is outside of the scope of the Villages Plan.
- 5.9 A cumulative negative, albeit uncertain, effect is identified for policy VP01 and at all villages for **noise pollution** (objective 6), as new development can increase noise, particularly during construction and also from an increase in vehicular traffic. It is noted that some villages are located on main roads that already provide a degree of noise pollution (Clyst St Mary, Kilmington, Musbury, Newton Popleford, Sidbury, Woodbury).
- 5.10 Policy VP01 and all of the Village BUABs are seen as having positive effects in relation to **maintaining and improving cultural, social and leisure provision** (objective 7) given the range of such facilities to meet day-to-day needs of residents. Beer’s attraction as a tourist destination means it has a variety of cultural facilities such as art galleries and a Heritage Centre.
- 5.11 Negative effects (with some uncertainty) upon the **historic environment** (objective 8) are likely at several Villages, specifically where heritage assets such as Conservation Areas and listed buildings are present – these are Beer, Colyton, East Budleigh, Kilmington, Musbury, Newton Popleford, Sidbury, Whimple, and Woodbury.
- 5.12 The delineation of BUABs to incorporate core built form should ensure the **wise use of land** (objective 9) although, by their nature, the Village BUABs are located in rural areas where it is important to **protect and enhance landscape character** (objective 9) is important. There is some uncertainty on this issue depending upon further site-specific detail, but the appraisal sets out a mix of positive effects for the wise use of land, and negative effects for those villages that are affected by AONB e.g. Beer, Colyton, East Budleigh, Kilmington, Musbury, Newton Popleford, Sidbury, and Uplyme.
- 5.13 A negligible, uncertain effect is considered likely on **local amenity** issues (objective 10), apart from where busy roads dissect a village (Clyst St Mary, Woodbury) where identifying the BUAB is seen as negative.
- 5.14 **To conserve and enhance biodiversity/geodiversity** (objective 11) is an important issue at all Village BUABs, with most being within 10km of European protected sites, and a range of SSSIs and County Wildlife Sites present across rural areas. Although mitigation will minimise the impact, a minor negative effect is likely for policy VP01 and at all villages.
- 5.15 **Non-car based modes of transport and reduced journey lengths** (objective 12) are promoted through the use of reasonable walking distances to community services as a key determinant for the BUABs. Therefore, positive effects are

considered for policy VP01 and all Villages BUABs, noting that availability of public transport varies amongst them e.g. Feniton and Whimble have train stations but a poor bus service, whilst Clyst St Mary has three buses per hour to Exeter City Centre. Topography, lack of footpaths, and car traffic may deter walkers/cyclists in some villages e.g. Beer, Uplyme, West Hill.

- 5.16 Positive effects are likely for most villages for **maintaining and enhancing air, soil and water quality**, (objective 13) apart from Clyst St Mary which includes a Greenfield site of partly Grade 1 agricultural land. Negative uncertain effects are identified at Colyton, Kilmington and Musbury where the proximity of the BUAB to the River Axe SAC could potentially affect water quality. These effects counterbalance each other to a degree, meaning a negligible effect overall for policy VP01.
- 5.17 **A reduction in local emissions of greenhouse gases and increased capacity to adapt to climate change** (objective 14) may not occur through additional development in the BUABs, although any built development is likely to be small scale and emissions from travel should be minimised due to the presence of services and facilities. The incorporation of mitigation required in the NPPF and Local Plan policies to adapt to climate change (e.g. designed to cope with hotter, drier summers; warmer, wetter winters; and more extreme weather events) should ensure a negligible effect overall for policy VP01 and at all Village BUABs.
- 5.18 There are areas of medium-high **flood risk** (objective 15) within or in close proximity to all of the Village BUABs, apart from Feniton, although this village has been affected by surface water flooding. The implementation of NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale, potentially re-using existing buildings, meaning that additional impermeable surfaces will be limited. This means that overall a negligible effect has been given for policy VP01 and all Villages, with some uncertainty depending upon specific location and design of new development.
- 5.19 Negligible effects are likely on **efficient energy consumption** (objective 16), as this issue will be more appropriately addressed by the design of new developments, which is outside of the scope of the Villages Plan. The re-use of buildings and brownfield sites should mean positive effects upon **waste resources** (objective 17).
- 5.20 Policy VP01 and the Village BUABs should have minimal effects upon **maintaining sustainable growth of employment** (objective 18). Although out-commuting from new residents may be likely due to a relative lack of job opportunities at the Villages, new development would be limited apart from at Clyst St Mary where the boundary encompasses two large housing sites and therefore a negative effect is considered.
- 5.21 The identification of Village BUABs provides the opportunity for new development to **enhance the vitality and viability** (objective 19) of the villages, whilst **indigenous and inward investment** (objective 20) should be particularly encouraged at Beer through its attraction for tourism, and Colyton due to its relatively greater range of services and businesses.

Village/Town Centre vitality and Greendale/Hill Barton policies

5.22 The detailed matrices of the vitality policies (VP02 and VP03) at Beer and Colyton, and policies relating to Greendale and Hill Barton Business Parks (VP04 and VP05) can be found in Appendix 4, whilst the scores are summarised in table 9 below and the text that follows.

Table 9: Sustainability Appraisal findings for Village/Town Centre vitality and Greendale/Hill Barton policies

SA obj.	VP02 – Beer vitality	VP03 – Colyton vitality	VP04 – Greendale	VP05 – H. Barton	SA obj.	VP02 - Beer vitality	VP03 - Colyton vitality	VP04 – Greendale	VP05 – H. Barton
1: Homes	0	0	0	0	11: Biodiversity	0	0	+	+
2: Services	++	++	0	0	12: Transport	+	+	0	0
3: Education	0	0	0	0	13: Air, soil, water	0	0	+	+
4: Health	+	+	0	0	14: Climate	0	0	0	0
5: Crime	0	0	0	0	15: Flooding	0	0	+	+
6: Noise	0	0	0	0	16: Energy	0	0	0	0
7: Culture	++	++	0	0	17: Waste	0	0	0 ?	0 ?
8: Heritage	+	+	0	0	18: Employment	+	+	0	0
9: Landscape	0	0	+	+	19: Vitality	++	++	0	0
10: Amenity	+	+	+	+	20: Investment	+	+	-	-

Policy VP02 Beer – Village Centre vitality

5.23 The policy restricts changes of use to residential, but the limited scale of any residential change means that the policy would have negligible effects on **the opportunity to live in a decent home** (objective 1). The policy resists the loss of main town centre uses in Beer village centre, and therefore a significant, long-term positive effect is identified for **access to community services; cultural, social and leisure provision**; and maintaining the **vitality and viability of the towns** (objective 2, 7, 19). Positive effects are given for **improving health** as health centres constitute a main town centre use, and retaining the range of uses in the village centre provides walking/cycling access, promoting healthy travel (objective 4).

5.24 Objectives relating to the **historic environment** (objective 8) and **local amenity** (objective 10) are positive, as the policy resists changes of use that could impact upon these issues.

5.25 Resisting the loss of main town centre uses means that the policy is likely to have a positive effect on **promoting non-car modes of transport** (objective 12), as it will ensure facilities remain accessible to non-car based modes. This will also maintain

sustainable growth of employment (objective 18) and **encourage investment** (objective 20).

- 5.26 There are some objectives which are not considered likely to have an effect, relating to **crime; landscape character; biodiversity/geodiversity; air, soil and water quality; flooding; energy consumption; and waste resources** (objectives 5, 9, 11, 13, 15, 16, 17)
- 5.27 Other objectives may have some effect but only to a negligible degree, namely **education; noise; and greenhouse gas emissions** (objectives 3, 6, 14).

Policy VP03 Colyton – Town Centre Vitality

- 5.28 The policy restricts changes of use to residential, but the limited scale of any residential change means that the policy would have negligible effects on **the opportunity to live in a decent home** (objective 1). The policy resists the loss of main town centre uses, and therefore a significant positive effect is identified for **access to community services** (objective 2).
- 5.29 This policy positively seeks to maintain main town centre uses in Colyton, and therefore a significant, long-term positive effect for maintaining the **vitality and viability of the towns** (19). Similarly, a significant positive effect is given for **cultural, social and leisure provision** (7). Positive effects are given for **improving health** as the retention of shops will continue to provide the opportunity to access these on foot/bicycle, promoting healthy travel (objective 4).
- 5.30 Objectives relating to the **historic environment** (objective 8) and **local amenity** (objective 10) are positive, as the policy resists changes of use that could potentially impact upon these issues.
- 5.31 Resisting the loss of main town centre uses means that the policy is likely to have a positive effect on **promoting non-car modes of transport** (objective 12), as it will ensure these remain accessible to non-car based modes. This will also maintain **sustainable growth of employment** (objective 18) and **encourage investment** (objective 20).
- 5.32 There are some objectives which are not considered likely to have an effect, relating to **crime; noise; landscape character; biodiversity/geodiversity; air, soil and water quality; flooding; energy consumption; and waste resources** (objectives 3, 5, 6, 9, 11, 13, 15, 16, 17).
- 5.33 The effects upon **reducing Greenhouse gas emissions** (objective 14) may be positive through retaining main town centre uses and therefore minimising emissions from travel to these facilities, but only to a negligible degree.

Policy VP04 and VP05 – Greendale and Hill Barton Business Parks

- 5.34 A neutral/negligible effect is likely for many of the sustainability objectives, largely because these policies are focussed on the business parks, the extent of the business parks are shown for information purposes only rather than providing an explicit policy outcome, and the policies continue the Local Plan policy approach. This means that negligible effects are likely for some objectives through a continuation of current effects e.g. current travel patterns are likely to continue, so

promote and encourage non-car modes of **transport** and reduce journey lengths will be a neutral effect.

- 5.35 Positive effects are identified for **landscape, amenity** and **biodiversity**, as these objectives seek to conserve/maintain these environmental issues, and resisting further development would achieve this. Similarly, **air, soil and water quality** should be maintained, so a positive effect is likely; and there should also be no increase in **flood risk**.
- 5.36 The sustainable growth of **employment** in East Devon is advocated through sites at the Towns and in the West End in the Local Plan, rather than at Greendale and Hill Barton Business Parks, so a negligible effect is likely as this Local Plan policy approach will continue. On the other hand, a minor negative effect is likely for the more generic objective to encourage inward **investment**.

Cumulative effects of the Villages Plan

- 5.37 The following table presents a summary of the SA scores for policy VP01 – Built-up Area Boundaries; each Village BUAB; village centre vitality policies at Beer and Colyton (VP02, VP03); and policies for Greendale and Hill Barton Business Parks (VP04, VP05). This enables an assessment to be made of the likely cumulative effects of the Villages Plan.
- 5.38 There are cumulative positive effects for social objectives on providing homes, ensuring access to community services, providing for education, and improving health (particularly where health care facilities exist). This reflects the fact that identifying BUABs could facilitate small-scale development in proximity to existing services. The Beer and Colyton policies score particularly well on access to community services, reflecting the aspiration of these policies. Some uncertainty with regards to education is present at those villages where schools are at or near to capacity.
- 5.39 Positive cumulative effects are also evident on maintaining/improving cultural, social and leisure provision, promoting non-car travel, and maintaining/enhancing vitality and viability, with the Beer and Colyton policies significantly positive on this latter objective.
- 5.40 There are generally neutral/negligible effects for encouraging inward investment, apart from the Greendale/Hill Barton policies (VP04, VP05) where a negative effect is likely through a continuation of the restrictive Local Plan policy approach.
- 5.41 The rural location and proximity to protected sites, means that cumulative negative effects are likely for conserving biodiversity, as identifying the BUABs is likely to facilitate additional development, albeit at a small-scale. There may be some cumulative negative effects on the historic environment where valued assets are present, although there is an element of uncertainty until specific sites come forward.
- 5.42 There are cumulative mixed positive and uncertain negative effects as the BUABs should promote the wise use of land, but many are located within rural and/or designated landscapes.

Table 10: Summary of SA scores for policies VP01-05 and the Village BUABs

SA obj.	Policy VP01	Beer	Broadclyst	Clyst St Mary	Colyton	E. Budleigh	Feniton	Kilmington	Musbury	Newton Poppleford	Sidbury	Uplyme	West Hill	Whimble	Woodbury	Policy VP02	Policy VP03	Policy VP04	Policy VP05
1: Homes	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0
2: Services	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
3: Education	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0
4: Health	+	+	+	0	+	0	0	0	0	+	0	0	0	+	+	+	+	0	0
5: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6: Noise	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0
7: Culture	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
8: Heritage	-	-	0	0	-	-	0	-	-	-	-	0	0	-	-	+	+	0	0
9: Landscape	0	+/	+	0	+/	+/	+	+/	+/	+/	+/	+/	+	+	+	0	0	+	+
10: Amenity	-	0	0	-	0	0	0	0	0	0	0	0	0	0	-	+	+	+	+
11: Biodiversity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	+	+
12: Transport	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0
13: Air, soil, water	0	+	+	-	-	+	+	-	-	+	+	+	+	+	+	0	0	+	+
14: Climate	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
15: Flooding	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
16: Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
17: Waste	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0	0	0
18: Employment	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0
19: Vitality	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	0	0

20: Investment	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	+	+	-	-
-------------------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

Recommendations – Mitigation measures and Maximising the benefits of the Villages Plan

- 5.43 The negative effects identified in the SA mainly relate to the environmental effects of growth (particularly in relation to noise, heritage, biodiversity and possibly landscape), and the impacts of new housing and employment land within the BUABs, although these are likely to be minor given the likely small-scale of development.
- 5.44 The Villages Plan makes clear that it should be read in conjunction with the East Devon Local Plan (adopted January 2016). The adopted Plan includes a range of policies that will inform decisions made on development proposals at the BUABs, and within the identified centres at Beer and Colyton. This should reduce potential negative effects. Specific policies in the Local Plan that will mitigate environmental effects include:
- Strategy 46 – Landscape Conservation and Enhancement and AONBs
 - Strategy 47 – Nature Conservation and Geology
 - Strategy 48 – Local Distinctiveness in the Built Environment
 - Strategy 49 – The Historic Environment
 - Policies EN4 – EN10, and EN14 relating to biodiversity, heritage, and pollution, respectively.
- 5.45 In addition, proposals should be consistent with the National Planning Policy Framework, an important material consideration which provides further scope for reducing negative effects.
- 5.46 Overall, due to the nature of the effects identified, and the existing policies in place to mitigate such effects, there are no mitigation recommendations for the Villages Plan.

6 Monitoring

- 6.1 The SEA Regulations requires that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*” (Regulation 17) and that the environmental report should provide information on “*a description of the measures envisaged concerning monitoring*” (Schedule 2). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.
- 6.2 Government guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focussed on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Monitoring in respect of the Local Plan will also be of relevance to the Villages Plan and set out in this section of the report are key matters that will part overlap Local Plan monitoring but which are especially relevant to the Villages Plan.
- 6.3 As discussed in **Chapter 5**, the Village Plan BUABs could have potential effects (both positive and negative) on the SA objectives. Therefore, it is recommended that monitoring is undertaken to determine whether these effects do indeed occur due to implementation of the plan, and in order to seek to remedy or reverse them.
- 6.4 **Table 11** below presents suggested indicators for monitoring the potential significant sustainability effects of implementing the Villages Plan. Note that the indicators proposed are included as suggestions, and are informed by the indicators proposed in the SA Report for the East Devon Local Plan, reflecting the indicators proposed within the monitoring framework for the Local Plan itself. Given the limited scope of the Villages Plan and the lack of allocations in it, much of the monitoring will be undertaken as part of the Local Plan and this is reflected in the suggested indicators. It should be noted that objective 5 is not included as no effects have been identified for the Villages Plan.
- 6.5 In addition, the data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore appropriate to continue dialogue with statutory environmental consultees and other stakeholders commenced as part of the SA process and plan preparation, and work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable. It should also be noted that indicators for the historic environment may vary at different stages of the assessment process and the sustainability indicators have been devised to indicate the impact of the plan on the historic environment.

Table 11: Suggested 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.
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.

SA Objectives for which potential effects have been identified	Suggested Indicators
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.
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.

7 Conclusions

- 7.1 The SA has assessed the sustainability effects of the Villages Plan, within the context of the adopted Local Plan.
- 7.2 Positive effects have been identified for policy VP01 and the BUABs on social objectives for providing homes, ensuring access to community services, providing for education, and improving health; and maintaining/improving cultural, social and leisure provision, promoting non-car travel, and maintaining/enhancing vitality and viability.
- 7.3 Some negative effects have been identified, mainly relating to the environmental effects of growth, and the impacts of new housing and employment land within the BUABs. Although it should be noted that additional development that would be facilitated by identifying BUABs through the Villages Plan is likely to be small-scale.
- 7.4 The village centre vitality policies VP02 and VP03 for Beer and Colyton result in significant positive effects on ensuring access to community services and supporting their vitality and viability.
- 7.5 The Greendale and Hill Barton policies VP04 and VP05 resist further development so score well on environmental objectives, but a minor negative effect is likely for the objective to encourage inward investment.
- 7.6 Reasonable alternatives have also been subject to SA, and explanation is provided as to why the preferred option has been chosen. No mitigation measures were recommended, given the existing policy framework in the adopted Local Plan and the NPPF.

Next steps

- 7.7 The SA Report will be made available for consultation alongside the East Devon Villages Plan incorporating Main Modifications, during the period from **18 December 2017 to 2 February 2018**.
- 7.8 Following this public consultation, this SA report and accompanying consultation responses will be sent to the Planning Inspector to continue the Examination of the Villages Plan. If no further changes are required, this SA report will be published alongside the adopted Villages Plan. A sustainability appraisal 'adoption statement' will also be published at this stage that will explain how sustainability considerations have informed the Plan.

Appendix 1 - Feedback Received to Scoping Report Consultation

Feedback from the scoping report dated March 2016 is summarised in the table below. In this table the following abbreviations are used.

E.A. = Environment Agency; H.E. = Historic England; and N.E. = Natural England.

Point raised	Consultee	How addressed in the SA Report
Reference emerging Flood Risk Management Plan	E.A.	Agree, this has been added to the Plans & Programmes section of the SA Report (Chapter 3).
Reference Local Flood Risk Management Strategy produced by Devon County Council	E.A.	Agree, this has been added to the Plans & Programmes section of the SA Report (Chapter 3).
Reference South West River Basin Management Plan	E.A.	Agree, this has been added to the Plans & Programmes section of the SA Report (Chapter 3).
Baseline should include objectives of the Water Framework Directive – target that all water bodies meet Good Ecological Status by 2027 and may in East Devon below this target.	E.A.	Agree, this has been added to the Baseline section of the SA Report (Chapter 3).
Consider evolution of baseline issues resulting from climate change, to help villages adapt and remain sustainable.	E.A.	Agree, this has been added to the Baseline section of the SA report (Chapter 3).
Further sustainability issues should be informed by the additional baseline issues recommended above (i.e. ecological status of water-bodies in East Devon).	E.A.	Agree, this has been added to the Baseline section of the SA report (Chapter 3).

Point raised	Consultee	How addressed in the SA Report
Consider amending framework objective 'to ensure that there is no increase in the risk of flooding' to 'ensure that there is no increase in the risk of flooding as a result of development' because the increase flood risk due to climate change will make the first objective difficult to satisfy.	E.A.	Agree, this is addressed in Table 3 (i.e. the SA Framework) of the SA Report.
Consider including an objective regarding the ability of the district's villages to adapt to the challenges of climate change.	E.A.	Agree, this is addressed in Table 3 (i.e. the SA Framework) of the SA Report.
Reference to more relevant plans and programmes (as referred to in the Historic England Guidance on SEA/SA) should be included.	H.E.	Agree – additional plans and programmes are included in Chapter 3 and Appendix 2 of the SA report.
Baseline evidence should describe the current and likely future state of the historic environment in order to identify sustainability issues, predict and monitor effects and identify alternative solutions.	H.E.	Agree – additional baseline data included.
There should be a proper assessment of the significance of affected heritage assets and their settings and what this means for the principle of development and any future design The Sustainability Appraisal should not be used as a heritage impact assessment for the villages plan as it is too general in approach and not undertaken by someone with relevant experience.	H.E.	In most cases the Built-up Area Boundaries (BUAB) will not include additional sites to those already within the defined BUAB. However, where significant change is proposed this issue will be considered in an appropriate manner through the plan making process.
Sites on the Historic England heritage at risk register may be directly affected by some of the allocation sites and consideration should be given to how these could be brought into use or repaired.	H.E.	There are no sites on the 'at risk' register for the settlements considered in the Villages Plan.

Point raised	Consultee	How addressed in the SA Report
Suggest replacing Objective 8 'to maintain and enhance built and historic assets' with 'conserve and enhance the historic environment, heritage assets and their settings'.	H.E.	Agree, this is addressed in Table 3 (i.e. the SA Framework) of the SA Report.
Include reference to historic environment in column 2 of Objective 10.	H.E.	Agree, this is addressed in Table 3 (i.e. the SA Framework) of the SA Report, although the terminology from the SEA Regulations has been used instead, as this is what the 2 nd column is setting out, i.e. 'Cultural heritage including architectural and archaeological heritage'.
Indicators for the historic environment may vary at different stages of the assessment process and should clearly demonstrate the impact of the plan on the historic environment.	H.E.	Agree, this is addressed in the Monitoring section of the SA Report (Chapter 5).
Monitoring indicators should be set out in the Environmental/Sustainability Appraisal Report and finalised in the adopted plan.	H.E.	Agree, this is addressed in the Monitoring section of the SA Report (Chapter 5).
A clearer thread should run through the scope from plans and projects, baseline information, sustainability issues and problems through to objectives and sustainability indicators.	N.E.	Agree, this has been addressed in the Plans & Programmes, Baseline, Key Sustainability Issues and SA Framework sections of the SA Report (Chapter 3).

Point raised	Consultee	How addressed in the SA Report
<p>Without seeing details of the criteria that will be used to define BUAB's it is assumed that a significant amount of development may come forward. Given the close proximity of some of the villages 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.</p>	<p>N.E.</p>	<p>A draft Habitats Regulation Assessment – Screening for Likely Significant Effects has been produced and is available for comment at http://eastdevon.gov.uk/planning/planning-policy/villages-plan/villages-plan-2016-consultation</p>
<p>The SE Devon European Site Mitigation Strategy, the AONB Management Plan and Dorset and East Devon World Heritage Site Management Plan should be included among the most relevant plans.</p>	<p>N.E.</p>	<p>Agreed. The SE Devon European Site Mitigation Strategy was already referred to in the Scoping letter, however, it and the two AONB management plans plus the Dorset and East Devon Coast World Heritage Site Management Plan have been included in the Plans & Programmes section of the SA Report (Chapter 3).</p>
<p>The Beer Quarry & Caves SAC and River Axe SAC should both be identified in the baseline information. This should include the latest information on bat sustenance zones and commuting/foraging routes around Beer Quarry Caves should be included as it is relevant to the settlement boundaries of Colyton and Beer.</p>	<p>N.E.</p>	<p>Agree, this is addressed in the Baseline section of the SA Report (Chapter 3).</p>
<p>The SSSI's near the villages under consideration should be specifically mentioned.</p>	<p>N.E.</p>	<p>Agree, this is addressed in the Baseline section of the SA Report (Chapter 3).</p>
<p>Consideration should be given to including information about coastal change and water quality.</p>	<p>N.E.</p>	<p>Agree, this is addressed in the Baseline section of the SA Report (Chapter 3).</p>

Point raised	Consultee	How addressed in the SA Report
<p>Identifying sustainability issues and problems:</p> <p>The first key issue as listed is not complete and should be amended to read:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>The last issue should be amended as follows:</p> <ul style="list-style-type: none"> The need to consider avoid any adverse impact on Beer Quarry & Caves or and River Axe Special Areas of Conservation. 	<p>N.E.</p>	<p>Agree, this is addressed in the Key Sustainability Issues section of the SA Report (Chapter 3).</p>
<p>An additional key issue on protecting landscape should be included given the AONB relationship with some villages.</p>	<p>N.E.</p>	<p>Agree, this is addressed in the Key Sustainability Issues section of the SA Report (Chapter 3).</p>
<p>Developing the SA framework:</p> <p>The methodology should include the testing of <i>cumulative</i> effects of all the plan's policies and criteria/definition for boundary changes.</p>	<p>N.E.</p>	<p>Agree, but this will be addressed during the appraisal of Plan options and subsequent policies, rather than through a specific additional objective (because the SEA Regulations require cumulative effects to be identified for all topics covered in the SEA).</p>

Point raised	Consultee	How addressed in the SA Report
Geodiversity should be added into the objectives so that it logically follows from the key sustainability issues and problems identified.	N.E.	Agree, this has been added to SA Objective 11 in the SA Framework.
The protection of the European sites and SSSIs within the area could be added as a specific objective.	N.E.	Agree, this has been added to SA Objective 11 in the SA Framework.
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.	N.E.	Agree, this is addressed in the Monitoring section of the SA Report (Chapter 5).

Appendix 2 – Summary of main issues raised on the draft Sustainability Appraisal Report (July 2016) and how they have been addressed

Comments made specifically on the Sustainability Appraisal Report

Rep. No.	Name	Comment	EDDC Response
329	Historic England	Concerned that plan needs to set out a positive strategy for conservation to comply with NPPF and greenfield sites seem to have been included in the boundary without an appropriate assessment of the impact of development on heritage assets and their setting. The SA/SEA is not an appropriate evidence base for this work and the SA/SEA cannot conclude that the objectives for sustainable development have been understood	Through discussions with Historic England it has been noted that very few additions (that do not have the benefit of planning permission) are proposed BUAB's when compared with the previously adopted plan. The only two significant additions where development could affect the setting of heritage assets are Musbury. A heritage assessment is being undertaken in accordance with the Historic England guidance 'The Historic Environment in Local Plans' and this will be referred to in the subsequent SA Report for the BUAB at Musbury.
3712	Environment Agency	No concerns - satisfied that the major environmental policy issues are covered by the Local Plan (e.g. Part 2 of Strategy 6 which states that development in villages should have no adverse effects on flood risk). Have engaged with the various town and parish councils as they have developed their neighbourhood plans and therefore have had the opportunity to address locally specific issues with them.	Support noted.
3743	Natural England	We welcome the structure and clarity of the SA. We also welcome the appraisal of the different options for boundary definition. The SA should however also include an assessment of the individual proposals for development boundary definition for each village. Choices were made in the draft DPD to reduce, expand or keep the development boundary as is, and these choices require to be underpinned by SA, as was done for the HRA. The same applies also to the definition of development boundaries for the two employment sites. The conclusions from	Support for the structure and clarity of the SA is noted. The draft SA report (para 4.31) explained that a broad approach to appraising options has been taken, as a detailed SA of individual sites would be disproportionate, particularly given that the plan was not seeking to allocate land for development. Such detail is included within the site-by-site assessments that have been carried out for

		<p>the HRA regarding each development boundary should also be used in the SA.</p>	<p>each Village, and reference to these assessments will be added to the SA report.</p> <p>Nevertheless, the Council consider that further detail on the sustainability effects of each proposed Village BUAB would be useful, and an SA matrix for each Village BUAB and Reasonable Alternatives has been prepared.</p> <p>Development boundaries have not been established for the two employment sites – the maps only show the extent of authorised business uses. Nevertheless, given other consultee responses advocating growth at the town business parks (Greendale and Hill Barton), SA has been undertaken of options to allows further growth, or continue to restrict growth.</p>
6151	Savills on behalf of Taylor Whimpey	<p>Concerned about assumptions made and conclusions reached. Overlooks importance of alternatives in meeting needs of rural areas. Contest references made in Table 5 which sets out main impacts arising from development.</p> <ul style="list-style-type: none"> Concerned about admission that Villages Plan may only 'to some extent' provide for housing in the villages – the plan does not make provision for any housing delivery in the rural areas and concerned that the SA makes assumptions that restricting delivery of market housing could assist in providing higher levels of affordable housing – assumption is flawed as would rely on 'exceptions'; Unless Villages Plan incorporates policies for sustainable growth Council cannot justify statements about allowing appropriately located development to come forward while affording relevant protection; <p>Dismissal of alternative options misleading and unjustified as no plan for growth. Only Option 4 provides for extension of BUAB's to accommodate future development.</p> <p>Statutory duty on Local Planning Authorities to prepare plans 'with the objective of contributing to the achievement of sustainable development'. Given this duty it is not acceptable to dismiss conclusions of SA without very strong justification.</p>	<p>The approach to meeting the needs of rural areas is set out in the Local Plan (adopted January 2016). The main role of the Villages Plan is mainly to define 'built up area boundaries' for the villages (Local Plan Strategy 6). These identify areas that are considered appropriate to accommodate growth and development, and therefore facilitate limited development.</p> <p>The table presenting the likely evolution without the plan and makes clear that, whilst the Local Plan makes provision for housing development at the Villages, the Villages Plan will provide greater clarity on appropriate locations for growth through the definition of BUABs, where the 'principle' of development is considered acceptable. Defining a boundary can help secure affordable housing exceptions sites by providing greater clarity on when the policy will be applied, as opposed to the Villages being within open countryside.</p> <p>The "<i>plan for growth</i>" is set out in the adopted Local Plan, and the Villages Plan should conform with this, unless justified otherwise.</p>

		<p>Option 4 was found to score positively against most of the objectives, whereas Option 1 was found to be ‘not the most desirable option for all sustainability criteria, less so for the economic objectives’.</p> <p>Conclusion on taking walking distances into account and that this may result in ‘less pedestrian activity and more reliance on the private car’ is so generalised it is worthless. Such assessments can only be made on a site by site basis and should not be a blanket restriction on peripheral locations.</p>	<p>The positive economic benefits of Option 4 are noted, but overall the SA concluded that Option 2 performed best, and this was the preferred option – therefore its conclusions have not been dismissed. Site-by-site assessments have been carried out, but the purpose of the SA is to identify the likely significant effects. Larger BUABs are likely to mean walking distances beyond the preferred maximum of 800m to town centre facilities, and therefore likely to discourage walking to such facilities.</p>
6324	Devon County Council	<p>Several relatively minor comments relating to amended wording of the SA/SEA to reflect flooding issues.</p>	<p>Make minor amendments as suggested.</p>
7640	Vail Williams on behalf of Mulberry Architectural Services Ltd	<p>Challenges findings of some of options.</p> <p>Option 2 states that there are ‘significant positive benefits in respect of access to facilities and health’, but the benefits are marginal where sites are close to proposed boundary and not all services are in the notional centre.</p> <p>Option 3 would be contrary to the NPPF objective of significantly boosting housing delivery and should be dismissed.</p> <p>Option 4 is discounted as having ‘significantly negative impacts’, but these are based on sweeping statements about the use of the car and biodiversity/landscape that are unjustified as these would be filtered out by redefining the BUAB’s and through the development management process.</p> <p>Option 4 is actually the most positive option and fits best with the NPPF.</p>	<p>Option 2 explicitly assesses walking distances to services, rather than the “notional centre”.</p> <p>Agree that Option 3 does not perform best in the SA, and this option is not preferred.</p> <p>It is noted that the NPPF and Local Plan policies would mitigate some of the adverse effects of Option 4 through the development management process. However, the principle of development would be accepted if located within the BUAB, and it would therefore be more difficult to address negative effects if BUABs have a larger extent.</p> <p>Although the benefits of Option 4 relating to housing and economic development are noted, adverse effects are identified for landscape, biodiversity/ geodiversity, and sustainable travel.</p>

Comments suggesting alternative Built-up Area Boundaries at the Villages

A summary of the main issues raised by representations in the Consultation Draft Villages Plan (August 2016), the Proposed Submission Local Plan (March-May 2017), and the SA Report (February 2017) along with how these main issues have been addressed, is set out in the [Consultation Statement](#). Some of the consultation responses suggested amendments to the Built-up Area Boundaries. The vast majority of the sites suggested for inclusion in the Village BUABs are small-scale and the likely significant effects would be the same as the proposed BUAB (as discussed in Chapter 5 and detailed in Appendix 4). They are not different way of fulfilling the objectives of the plan and therefore do

not constitute “reasonable alternatives”. The exception is a site put forward for inclusion in Feniton BUAB, comprising some 31 hectares of land that, due to its large scale and different sustainability implications, has been subject to SA. The SA matrix (Appendix 4) for this alternative shows significant positive effects on housing delivery, but negative environmental effects relating to the historic environment, landscape character, loss of Greenfield and best and most versatile agricultural land, greenhouse gas emissions, and not matching the level of jobs with the economically active workforce. For these reasons, this alternative is not preferred.

In addition, consultation responses advocated further growth at Greendale and Hill Barton Business Parks, as the Villages Plan only identified the extent of authorised business uses. These sites are not within the BUAB (contrary to Local Plan Strategy 6) and Local Plan Policy E7 Extensions to Existing Employment Sites does not apply at these two sites; therefore further growth would not be fully consistent with the adopted Local Plan. Despite this, given the consultation responses and national policy that places significant weight on the need to support economic growth through the planning system, growth at these two business parks is considered a reasonable alternative to appraise. As explained in Chapter 4 and Appendix 4, the option not to identify BUABs allowing expansion at Greendale and Hill Barton Business Parks performs better in the SA for the reasons given above, and is therefore the preferred option.

Appendix 3 - Review of plans, policies and programmes

Set out below is a review of the key policy documents identified to date, that provide strategic and local guidance relevant to spatial planning in East Devon. The table gives an overview of objectives and associated targets and indicators and highlights any implications for both the Villages Plan and the associated Sustainability Appraisal. It is stressed that the review of documents is not intended to be comprehensive and 'all embracing' and that to gain a full picture, documents should be referred to in their entirety. Documents are summarised on the basis of whether they exist in the **International** context, the UK/England **National** context, the Devon wide **County** context or the **East Devon District** Context.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
INTERNATIONAL				
Johannesburg Declaration on Sustainable Development (2002)	<p>Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.</p> <p>Renewable energy and energy efficiency.</p> <p>Accelerate shift towards sustainable consumption and production.</p>	<p>Greater resource efficiency.</p> <p>New technology for renewable energy.</p> <p>Increase energy efficiency.</p>	Ensure that any policies take account of the Declaration.	Include sustainability objectives to enhance the natural environment and promote renewable energy and energy efficiency.
Aarhus Convention (1998)	<p>Established a number of rights of the public with regard to the environment. Local authorities should provide for:</p> <p>The right of everyone to receive environmental information.</p> <p>The right to participate from an early stage in environmental decision making.</p> <p>The right to challenge in a court of law public decisions that have been made without</p>	No targets or indicators.	Ensure that any policies take account of the Convention.	Ensure that public are involved and consulted at all relevant stages of SA production.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
	respecting the two rights above or environmental law in general.			
Bern Convention (1979)	The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in Bern, Switzerland in 1979, and came into force in 1982. The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix III. To this end the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species.	No targets or indicators.	Ensure that any policies take account of the Convention.	Include sustainability objectives to protect and enhance biodiversity.
Ramsar Convention (1971)	The Convention on Wetlands of International Importance, called the Ramsar Convention, is the intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. The Convention was adopted in the Iranian city of Ramsar in 1971 and came into force in 1975. Since then, almost 90% of UN member states, from all the world's geographic regions, have acceded to become "Contracting Parties". The Convention's mission is "the conservation and wise use of all	No targets or indicators.	Ensure that any policies take account of the Convention.	Include sustainability objectives to protect and enhance biodiversity.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
	wetlands through local and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world".			
EU Directives				
<i>SEA Directive 2001 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</i>	Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development. This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.	The Directive must be applied to plans or programmes whose formal preparation begins after 21 July 2004 and to those already in preparation by that date.	Allocate sites and develop policies that take account of the Directive as well as more detailed policies derived from the Directive at a national level	Requirements of the Directive must be met in Sustainability Appraisals.
<i>The Industrial Emissions Directive 2010 Directive 2010/75/EU on industrial emissions (integrated pollution</i>	This Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.	The Directive sets emission limit values for substances that are harmful to air or water.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objective for reducing pollution.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
prevention and control)				
<i>Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU</i>	The Directive aims to promote the energy performance of buildings and building units. It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.	No targets or indicators.	Policies and site allocations should take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include SA objective relating to the energy performance/efficiency of existing and proposed buildings.
<i>The Birds Directive 2009 Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended</i>	The preservation, maintenance, and reestablishment of biotopes and habitats shall include the following measures: Creation of protected areas. Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones. Re-establishment of destroyed biotopes. Creation of biotopes.	No targets or indicators.	Develop policies to make sure that the upkeep of recognised habitats is maintained and not damaged from development. Avoid pollution or deterioration of habitats or any other disturbances effecting birds.	Include sustainability objectives for the protection of birds.
<i>The Waste Framework Directive 2008 Directive</i>	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without	Development of clean technology to process waste and promote recycling.	Develop policies that take account of the Directive as well as more detailed policies	Include sustainability objectives that minimise waste

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
2008/98/EC on waste	endangering human health and without using processes that could harm the environment.		derived from the Directive contained in the NPPF.	production as well as promote recycling.
<i>The Air Quality Directive 2008</i> Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Avoid, prevent and reduce harmful effects of ambient noise pollution on human health and the environment.	No targets or indicators.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to maintain and enhance air quality.
<i>The Floods Directive 2007</i> Directive 2007/60/EC on the assessment and management of flood risks	Establish a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.	Devon County Council Flood Risk Management	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives that relate to flood management and reduction of risk.
<i>The Water Framework Directive 2000</i> Directive 2000/60/EC establishing a framework for community	Protection of inland surface waters, transitional waters, coastal waters and groundwaters.	No targets or indicators.	Develop policies that take account of the Directive as well as more detailed policies derived from the	Include sustainability objectives to protect and minimise the impact on water quality.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
action in the field of water policy			Directive contained in the NPPF.	
<i>The Landfill Directive 1999</i> Directive 99/31/EC on the landfill of waste	Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.	Reduce the amount of biodegradable waste sent to landfill to 75% of the 1995 level by 2010. Reduce this to 50% in 2013 and 35% by 2020.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to increase recycling and reduce the amount of waste.
<i>The Drinking Water Directive 1998</i> Directive 98/83/EC on the quality of water intended for human consumption	Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.	Member States must set values for water intended for human consumption.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to protect and enhance water quality.
<i>The Packaging and Packaging Waste Directive 1994</i> Directive 94/62/EC on packaging and packaging waste	Harmonise the packaging waste system of Member States. Reduce the environmental impact of packaging waste.	By June 2001 at least 50% by weight of packaging waste should have been recovered, at least 25% by weight of the totality of packaging materials contained in packaging waste to be recycled	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to minimise the environmental impact of waste and promote recycling.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
		with a minimum of 15% by weight for each packaging material.		
<i>The Habitats Directive 1992</i> Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	No targets or indicators.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to protect and maintain the natural environment and important landscape features.
<i>The Nitrates Directive 1991</i> Directive 91/676/EEC on nitrates from agricultural sources.	Reduce water pollution caused or induced by nitrates from agricultural sources and prevent further such pollution.	Identification of vulnerable areas.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to reduce water pollution.
<i>The Urban Waste Water Directive 1991</i> Directive 91/271/EEC concerning urban waste water treatment	Protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.	No targets or indicators.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to reduce water pollution.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
Other European Strategies, Plans and Programmes				
European Spatial Development Perspective (1999)	Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.	No targets or indicators.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to conserve natural resources and cultural heritage.
EU Seventh Environmental Action Plan (2002-2012)	<p>The EU's objectives in implementing the programme are:</p> <ul style="list-style-type: none"> (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing; (d) to maximise the benefits of the Union's environment legislation; (e) to improve the evidence base for environment policy; (f) to secure investment for environment and climate policy and get the prices right; 	No targets or indicators.	Develop policies that take account of the Directive as well as more detailed policies derived from the Directive contained in the NPPF.	Include sustainability objectives to protect and enhance the natural environment and promote energy efficiency.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
	<p>(g) to improve environmental integration and policy coherence;</p> <p>(h) to enhance the sustainability of the Union's cities;</p> <p>(i) to increase the Union's effectiveness in confronting regional and global environmental challenges.</p>			
European Landscape Convention (Florence, 2002)	The convention promotes landscape protection, management and planning.	No indicators or targets.	Ensure that site allocations and policies take account of the Convention.	Include sustainability objectives to protect the archaeological heritage.
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992) <i>Revision of the 1985 Granada Convention</i>	Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater. Creation of archaeological reserves and conservation of excavated sites.	No indicators or targets.	Ensure that site allocations and policies take account of the Convention.	Include sustainability objectives to protect the archaeological heritage.
National				

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
National Planning Policy Framework (March 2012)	Presumption in favour of sustainable development. Delivering sustainable development by:	No targets or indicators.	Development plan has a statutory status as the starting point for decision making.	Sustainability appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.
	Building a strong, competitive economy.	No targets or indicators.	Set out clear economic visions for that particular area.	Include a sustainability objective relating to strengthening the economy.
	Ensuring vitality of town centres.	No targets or indicators.	Recognise town centers as the heart of their communities.	Include a sustainability objective relating to the vitality of town centers.
	Promoting sustainable transport	No targets or indicators.	To implement sustainable transport modes depending on nature/location of the site, to reduce the need for major transport infrastructure.	Include a sustainability objective relating to sustainable transport.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
	Delivering a wide choice of high quality homes.	No targets or indicators.	Identify size, type, tenure and range of housing that is required in particular locations.	Include a sustainability objective relating to housing availability and quality.
	Requiring good design.	No targets or indicators.	Establish a strong sense of place to live, work and visit.	Include a sustainability objective relating to maintaining quality and character of local environment.
	Promoting healthy communities.	No targets or indicators.	Promote safe and Accessible environments with a high quality of life and community cohesion.	Include a sustainability objective relating to health and well-being.
	Meeting the challenge of climate change, flooding, and coastal change.	No targets or indicators.	Use opportunities offered by new development to reduce causes/impacts of flooding.	Include a sustainability objective relating to climate change mitigation and adaption.
	Conserving and enhancing the natural environment.	No targets or indicators.	Recognise the wider benefits of biodiversity.	Include a sustainability objective relating to the conservation and

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
				enhancement of the natural environment.
	Conserving and enhancing the historic environment	No targets or indicators.	Sustain and enhance heritage assets and put them to viable uses consistent with their conservation.	Include a sustainability objective relating to the conservation of historic features.
	Facilitating the use of sustainable materials.	No targets or indicators.	Encourage prior extraction of minerals where practicable and environmentally feasible.	Include a sustainability objective relating to sustainable mineral extraction.
Regional/Sub-regional documents				
South West River Basin District Flood Risk Management Plan 2015 – 2021 (March 2016)	Forms part of a collaborative and integrated approach to catchment planning for water.	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 on either flood	Some of the settlements covered by the villages plan lie in steep sided valleys where river levels can rise rapidly in periods of intense rainfall.	Include a sustainability objective relating to flood risk.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
		defence grounds or water quality.		
South West river basin district – River basin management plan (Dec 2015)	Prevent deterioration of the status of surface waters and groundwater; achieve good status for all water bodies; reduce pollution of groundwater. Priority issues for East Devon catchment are: agricultural diffuse pollution, protected areas, invasive and non-invasive species.	Reducing pollution throughout the catchment	Consider impact of potential future development upon water quality	Include a sustainability objective relating to water quality
Dorset and East Devon World Heritage Site Management Plan 2009	A key aim is to protect the universal value of the World Heritage Site by allowing natural processes to continue'. A key objectives is to conserve and enhance the quality of the landscape.	Indicators related to conserving landscape quality and geodiversity.	Beer most affected by the world heritage site designation.	Objectives on landscape quality and geodiversity.
Devon wide documents				
Devon Waste Plan (2014)	The Waste Local Plan is a land use plan and sets out detailed criteria against which planning applications for waste management facilities can be assessed. Waste Hierarchy;/ Reduction, Re-use, Recovery, Recycling, Composting, Energy Recovery from Waste, Disposal Objectives: Promote public awareness & Prevent environmental degradation. To encourage the provision of waste management facilities close to major centers of population. To ensure that, where possible, Devon's waste is treated and	Devon County Council is the waste authority.	Energy recovery sites are identified at Greendale and Hill Barton.	Include sustainability objective on wise use of waste resources.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
	disposed of within the region. To promote the establishment of an effective and integrated network of management			
Devon Minerals Plan (Inspectors report received Oct 2016, adoption expected Feb 2017)	Provides the policy framework for decisions on planning applications for mineral development, and for non-mineral development that may affect mineral resources, over the period to 2033. Devon should continue to meet its aggregates needs, including maximizing use of secondary and recycled materials, while contributing to the economy through the supply of nationally important industrial minerals. Also enhance supply of building stone, enhancement of Devon living conditions and environment, and address climate change.	Devon County Council is the minerals planning authority.	Sand and gravel aggregates are extracted within Budleigh Salterton Pebble Beds, use of local stone in new development.	Objectives on supporting the economy, quality of environment
Devon Biodiversity Action Plan	Produced in response to the Rio Challenge and produced in 1999 and updated in 2005 the plan identifies 17 of Devon's key wildlife habitats and geological features, and 20 of its species that are under threat of have popular appeal. Action plans identify common priorities and actions.	Number of buildings demolished Findings from surveys submitted with planning applications. Species/habitats afforded protection.	The natural environment is a key resource within the District and habitat for species. New development will may an impact on these environments Including redevelopment of existing urban areas. Infill development can	Include a sustainability objective on conserving biodiversity.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
			result in loss of habitat and the reuse of buildings in the open countryside.	
Devon Flood Risk Management Strategy 2014	Produced by Devon County Council in line with the Flood and Water Management Act 2010. Deals with 'local' sources of flooding (surface water, groundwater and 'ordinary' water courses). Coupled with the County Council's Sustainable Drainage Systems (SuDS) Guidance, it encourages the use of SuDS on all development across Devon as a means of reducing downstream flood risk.	Number of planning permissions granted in settlements included in Villages Plan contrary to the advice of the Environment Agency <u>or Devon County Council as Lead Local Flood Authority</u> on either flood defence grounds or water quality.	There are local flood risk sources that have caused flooding in several settlements.	Include sustainability objective on flooding.
East Devon Wide Context				
East Devon Local Plan 2013 – 2031 (adopted Jan 2016)	Sets out the spatial strategy, scale and distribution of residential development and strategic policies for whole District. Strategy 6 sets the policy for development within Built-up Area Boundaries. Strategy 7 deals with development in the countryside. Strategy 26C deals with development at Uplyme. Strategy 27 states that Built-up Area Boundaries will be defined for the settlements listed through the	Local Plan targets are district-wide, but indicators could be applied at the Villages include: no. new homes built annually; availability of and proximity to facilities; recreation space standards being met; no. heritage assets on	The Local Plan sets the strategic context and scope for the Villages Plan.	The Local Plan was subject to SA in its own right and this should be seen as a key background piece of work.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
	Villages Plan. Detailed policies are contained in the Development Management policies.	'Heritage at Risk' register.		
East Devon AONB Management Strategy 2014 - 2019	Identifies the special qualities of the AONB, including locally distinctive villages, historic environment and its sense of tranquility	Protection of landscape character.	Beer, Uplyme, Kilmington, Sidbury, Musbury, Newton Poppleford and East Budleigh are in the East Devon AONB.	Include sustainability objective on landscape character and character of local environment.
South- east Devon European Site Mitigation Strategy (Oct 2014)	A strategy to mitigate for the potential in-combination impacts of new housing development on Exe Estuary SPA, Dawlish Warren SAC, and the East Devon Pebblebed Heaths SAC/SPA. Mitigation measures include the provision of alternative off-site green spaces; seeking financial contributions from development within 10km of the sites; and various, detailed on-site measures.	Visitor activities at set locations on all three sites.	The following villages are within 10km of one or more 'zones': Broadclyst, Clyst st Mary, East Budleigh, Feniton, Lympstone, Newton Poppleford, Sidbury, West Hill, Whimple, Woodbury.	Include a sustainability objective for biodiversity.
Conservation Area Appraisals for: • Beer, • Broadclyst;	Sets out the setting, history, built environment and special features of Conservation Area.	Change in number of heritage assets 'at risk'.	Helps to understand historic context of settlement core.	Include a sustainability objective for heritage assets.

Plan, Policy or Programme	Key objectives relevant to Villages Plan and SA	Key targets and indicators relevant to Villages Plan and SA	Implications for the Villages Plan	Possible Implications for SA
<ul style="list-style-type: none"> • Colyton; • East Budleigh; • Kilmington; • Lympstone; • Musbury; • Sidbury; • Whimble; and • Woodbury. 				

Appendix 4 – Appraisal Matrices

Appraisal Matrix of Strategic Options for Built-up Area Boundary definition

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
1. To ensure everybody has the opportunity to live in a decent home.	+	+	-	++	<p>Built-up Area Boundaries form a fundamental policy tool for providing a clear steer and guidance on where development will be permitted. Within boundaries new housing development will be permissible, but outside far more restrictive. To not have a boundary, with a policy implication of not having housing, would have scored negatively against this indicator. It should be noted that affordable housing, in particular, could come forward on sites outside of but abutting the boundary. With more tightly drawn boundaries more land (that may otherwise be suitable for development) will be outside boundaries and therefore this could potentially lead to more affordable housing being built. This last point could be especially so with a 5 dwelling threshold being needing to be exceeded to require affordable housing under normal policy. Many rural housing schemes will fall below a 5 dwelling affordable housing threshold.</p> <p>Option 1 – This option allows for new housing to come forward so has positive benefits identified.</p> <p>Option 2 - This option allows for new housing to come forward so has positive benefits identified. However exclusion of areas from the boundary, in comparison to Option 1, may result in lesser positive impacts by reducing scope for development when compared against Option 1. The scale of comparative impact would depend, however, on how much smaller end BuABs may be.</p> <p>Option 3 – This option (especially assuming a very tightly defined boundary) would allow for lower levels of housing to come forward and as such is shown as having a negative sustainability score.</p> <p>Option 4 – this option could allow for substantially more housing to come forward and as such is shown to have a more positive sustainability score, though this may not be so for affordable housing for which a negative delivery impact might arise.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
2. To ensure that all groups of the population have access to community services.	+	++	+	-	<p>The fact that 15 villages are to have Built-up Area Boundaries was based on assessment of the services and facilities they offer. All 15 villages have at least a basic range of services that could meet some of the basic needs of residents without the need to travel to other locations/main centres. Even the 15 villages vary greatly, however, in what they offer. Beer and Colyton, for example, have the greatest range of facilities and also more businesses and jobs in their communities, but no secondary school. Broadclyst, in contrast, has fewer facilities and businesses but has both a primary and a secondary school. Many of the other villages may have very limited employment opportunities and perhaps only a primary school, pub, shop, village hall and maybe one or two other facilities. Having facilities is one issue but accessibility to them is particularly important and this will be especially so for people that do not have access to a car and have to walk to facilities or are reliant on public transport. Public transport is often poor in villages and is of most relevance when travelling to locations outside of a village rather than for travel within it.</p> <p>Option 1 – This option, by defining a boundary that reflects existing built form, will typically result in development that is reasonably close to facilities, and so it is seen as generating positive benefits. However in some villages facilities do not have good pedestrian accessibility to all facilities and as such some new houses, in particular, might be comparatively remote from core facilities.</p> <p>Option 2 – This option is a refinement of Option 1 that explicitly looks at pedestrian accessibility. It scores significant positive benefits as it would ensure that infill development inside the BuAB would be in locations where walking distances and routes are reasonable for people to typically use.</p> <p>Option 3 – This option would, in most cases, typically be expected to have outcomes that could be similar to Options 1. Many villages have facilities in a reasonably central position so any approach that pulls boundaries inward could result in development that is permitted being closer to facilities.</p> <p>Option 4 – This option, especially if boundaries are extended outward in locations that are already quite remote from facilities, could lead to new development that does not offer easy pedestrian access to facilities.</p> <p>As a general note the above assessment is centred around accessibility to existing facilities from any new housing that is built. Instances may occur, however, where proposals for new services and facilities are built, where this is the case they could enhance pedestrian accessibility where houses were otherwise remote from services. It is not clear cut whether tighter or more relaxed boundaries will impact on facility delivery and in reality they quite possibly will have little bearing.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
3. To provide for education, skills and lifelong learning	0	0	0	0	<p>The key educational resource offered by villages is a primary school, though in the case of Broadclyst there is a secondary school as well. In addition to schools other buildings and facilities can, however, offer education and training opportunities. The boundaries drawn around settlements are, however, unlikely to have any real impact of the future/provision of facilities. Typically it would only be if substantial development occurs is it possible to secure developer contributions that are sufficient to provide new facilities.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified. Perhaps the only exception could be if very large amounts of development were permitted that could secure service provision in their own right or generate a population level that justifies provision (but it could be expected to achieve this may require very substantial development).</p>
4. To improve the population's health	+	++	+	-	<p>Development in general can sometimes have positive health impacts (e.g. new houses to live in, provision of additional open space) adverse impacts can sometime also arise (e.g. extra traffic on roads leading to safety concerns) and there could therefore be uncertainties associated with this element of appraisal. To be more meaningful, however, the particular issue of pedestrian accessibility to facilities is assessed and the potential likelihood of people walking to facilities, given that walking is a healthy activity in its own right.</p> <p>Option 1 - With boundaries following the existing built form of development and most settlements having facilities close to already developed areas this policy approach to boundary definition would be most likely to result in development typically being in reasonable walking distance of facilities.</p> <p>Option 2 – This option should be an improvement on Option 1 because it would seek to ensure that all boundaries will be defined taking into account ease of pedestrian accessibility and therefore is should encourage walking and the health benefits associated.</p> <p>Option 3 – This option could be an improvement on Option 1 as it is likely to reduce the scope for housing to be built outside of reasonable walking distance of facilities. However, without criteria to specifically define where boundaries are drawn there is no guarantee that this would be the case so it is not considered to be a preferable option to Option 2.</p> <p>Option 4 – This option would be less favourable than options 1 and 2, particularly in the larger settlements where areas included within the BUAB under option 1 are already beyond a reasonable walking distance.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
5. To reduce crime and fear of crime.	0	0	0	0	<p>In principle issues around whether boundaries are tightly drawn or more slackly drawn is not going to have or generate in principle impacts on crime or fear of crime. Therefore for all options a 'No impacts, either positive or negative are identified' response is provided.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	0	0	0	0	<p>Development during both construction and operation can have limited adverse noise impacts though in principle the issues around whether boundaries are tightly drawn or more slackly drawn is, in its own right, not going to have obvious impacts in respect of noise issues. Therefore for all options a 'No impacts, either positive or negative are identified' response is provided. Perhaps options 3 that allows for more development, more widely drawn boundaries, could have greater adverse impacts but even this is questionable.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
7. To maintain and improve cultural, social and leisure provision.	0	0	0	0	<p>In principle issues around whether boundaries are tightly drawn or more slackly drawn is, in its own right, not going to have obvious impacts in respect of cultural, social and leisure provision. Therefore for all options a 'No impacts, either positive or negative are identified' response is provided. Perhaps the options that allow for more development could place more pressure on what might be stretched existing facilities and so could have adverse impacts but by the same token they could potentially also facilitate new or extra provision and result in positive benefits (though this may require substantial development). Much will depend on particular detailed local circumstances and it goes beyond the remit of this appraisal.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>
8. To conserve and enhance the historic environment, heritage assets and their settings.	0	0	0	0	<p>Many of the villages to have a BuAB in East Devon will have a Conservation Area and Listed Buildings and they will all also have other heritage assets. The historic core area of villages are often found in central core areas where services and facilities will be located and so boundaries drawn around and to include these areas, and therefore placing some degree of in-principle acceptability for development, could have negative impacts. At their worst such impacts could be detrimental but exceptionally high quality development that is well planned and constructed (especially where sites are run down) can enhance historic built environment quality. Not with standing these general observations when it comes to in principle considerations it is determined that for each option a 'No impacts, either positive or negative are identified' response is appropriate. Local circumstances will be relevant on a case by case basis.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	0	+	+	--	<p>The landscape of East Devon is of a very high quality with two thirds of the District falling in an AONB. But even non-AONB areas are frequently of high landscape value and the landscape frequently forms an important setting for villages. Further development at villages can have adverse impacts and this can be particularly so in cases where existing lower density and open space areas are found at the fringes of villages and these spaces help form a graduated transition from denser built form often found in village core areas through to full open countryside. Any approach that provides for greater development at the fringes of settlement can be seen as having potential for adverse impacts. Further to this is the fact that development in East Devon villages can result in greenspace and gardens being lost to housing.</p> <p>Option 1 – Developing within the existing core built form could have some adverse impacts if it leads to the loss of green spaces but this would be countered in some cases by the fact that the proposed methodology for boundary definition does include provision to exclude the curtilage of properties in large gardens where they have the capacity to extend the built form of the settlement. Overall impacts will, however, depend on the specifics of any given scheme.</p> <p>Option 2 - Developing within the existing core built form could have some adverse impacts if it leads to the loss of green spaces but this would be countered by the fact that the proposed methodology for boundary definition does include provision to exclude the curtilage of properties in large gardens where they have the capacity to extend the built form of the settlement. Overall impacts will, however, depend on the specifics of any given scheme though because this approach would provide for less development than Option 1 it would probably lead to fewer adverse impacts.</p> <p>Option 3 – Option 3 by just concentrating development in the core areas of villages and with an outcome of less development could generate some positive benefits, or at least positive in comparison to alternatives.</p> <p>Option 4 – This option would provide for development over the greatest physical area/of the biggest scale and has, therefore, the potential for the biggest adverse impacts.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
10. To maintain the local amenity, quality and character of the local environment.	0	0	0	0	<p>Villages form very attractive living environments and typically are carefully looked after and valued by their residents. They do however, and as well, support other community facilities and businesses and there can be some degree of conflict between differing uses that can impact on amenity. Adverse and inappropriate development can also lead to potential for adverse impacts. Any extra development is more likely to lead to greater impacts though often the scale of any change can be slight or minimal and not create meaningful impacts. It is only really likely to be the case where specific sites or land areas are included in the boundary that could generate problems or issues in their own right that specific identifiable problems may arise or manifest themselves.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	0	--	<p>Open undeveloped land in villages, specifically including gardens, can be of great biodiversity value and often more so than fields in agricultural use. Development, especially at the village scale, will rarely enhance wildlife value and the loss of open space can be seen as a negative. For this reason the options assessed under this objective are identified as having adverse impacts.</p> <p>Option 1 – This option would result in infill development inside the BuAB and as the associated loss of greenspace is seen as generating adverse impacts. However with the criteria for boundary definition ensuring that large spaces, including larger gardens, are excluded from BuABs then adverse impacts are likely to be less than those approaches that allow for greater levels of development.</p> <p>Option 2 – This option would be expected to be similar to Option 1 though with the likelihood of less development the expectation would be of lower adverse impacts.</p> <p>Option 3 – This option would see tighter boundaries drawn with fewer green spaces therefore coming forward for development. This option is likely to see the least adverse impacts and as such, in comparative terms at least, is given a negligible or no impact result.</p> <p>Option 4 – this option would result in the highest levels of development and by implication the greatest use of greenspace. Large gardens could be especially vulnerable to development and as such this option is identified as having the highest adverse negative impacts.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	0	++	+	--	<p>A key factor behind identifying the specific 15 villages to have Built-up Area Boundaries was the fact that they do offer a range of services so that residents will be less car dependent to meet their every days needs and the requirement or leave a home village for purposes of working, shopping, education or entertainment is reduced. Within any village there may be cases where people may choose to use a car to access facilities; this is likely to be especially so in the physically biggest villages.</p> <p>Option 1 – By enclosing the core built form of a village in the BuAB this option is likely to typically promote or allow for development that is close to facilities, but there will be exceptions at larger villages where the need/desire to use cars increases.</p> <p>Option 2 – This option overcomes the concerns raised in Option 1 by ensuring that it will only be the pedestrian accessible to facilities parts of villages that will be included in BuABs. For this reasons the option is seen as having significant positive impact benefits.</p> <p>Option 3 - By enclosing the core built form of a village in the BuAB this option is likely to typically promote or allow for development that is close to facilities. In this respect it is similar to Option 1 and by placing a general constraint on new development it will result in scope for less new housing in particular to be beyond reasonable walking distances or on poor routes. However, it does presume that needed housing that would have to go elsewhere will be in elsewhere locations that are within walking distance of facilities.</p> <p>Option 4 – This option could be expected to result in more development, especially at the fringes of villages, and in these locations, in many cases, development could be at or beyond reasonable walking distances. A consequence might be expected to be less pedestrian activity and more reliance on the private car.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
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.	0	0	0	0	<p>Air, soil and water quality are key factors for ensuring environmental quality and health. Development can have adverse impacts though typically these should be minimised through the implementation of the NPPF and the Local Plan policies, and on this basis all of the options are regarded as typically not expecting to no generate specific impacts.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	-	0	0	-	<p>Key to the levels of greenhouses gases emitted are factors to include the way buildings are constricted and used and such matters as journeys made. Development in rural areas will typically result in residents being more car dependent than residents of development in towns, with many more facilities being closer. This does, however, presuppose that suitable and more appropriate areas are identified for development. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies.</p> <p>Option 1 – This option would result in some village development and as such have some adverse impacts.</p> <p>Option 2 – This option would be similar to Option 1 though with lower development levels expected and the onus on pedestrian accessibility the adverse impacts could generally be expected to be lower.</p> <p>Option 3 – This option would offer scope for lower impacts because it should simply result in lower levels of development.</p> <p>Option 4 – This option is seen as having the highest scope for adverse impacts because it would lead to the greatest levels of development and would allow for such development at and beyond the fringes of villages where journey lengths to facilities would be greater and people are far more likely to use the private car to access services.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0	0	0	0	<p>Flooding and risk of flooding are key technical constraints that need to feed into the planning process. However in respect of informing the general principles of where development might be accommodated specific concerns are not identified. Flooding matters are more a matter of local detail, consistent with the SuDS Guidance for Devon.⁹</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No explicit impacts, either positive or negative are identified.</p>
16. To ensure energy consumption is as efficient as possible.	0	0	0	0	<p>In respect to the operation of buildings (as opposed to travel considerations) there are no specific significant differences identified amongst the options. Buildings built on larger plots may offer scope for more application of renewable technologies though buildings on larger plots will frequently be larger themselves with higher energy costs in construction and operation.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	0	0	0	0	<p>In respect to the waste generated there are no specific significant differences identified amongst the options. Waste collection can be expected to be more expensive in villages, as opposed to towns, but on a general level all options are seen as having no real discernable negative impacts.</p> <p>Option 1 – No impacts, either positive or negative are identified.</p> <p>Option 2 - No impacts, either positive or negative are identified.</p> <p>Option 3 – No impacts, either positive or negative are identified</p> <p>Option 4 - No impacts, either positive or negative are identified.</p>

⁹ <https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	-	+	<p>The villages of East Devon provide varying degrees of jobs, some very much more than others. Any extra development is likely to provide jobs in its own right, through construction and general operation. Through an increase in the population there will be some extra consumers to support services and scope for extra business to open up.</p> <p>Option 1 – This option will provide for some development but not as much as others and is, therefore, seen as having no significant impacts.</p> <p>Option 2 – This option is similar to Option 1 in terms of no significant impacts.</p> <p>Option 3 – This option, in comparative terms, is likely to have negative impacts because it would act as a constraint on scope for development.</p> <p>Option 4 – This option would result in the highest levels of development and as such be most likely to generate positive benefits.</p>
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	0	+	<p>This sustainability objective refers to towns, though for this villages plan it is read and interpreted as being explicitly applicable to villages. The villages selected to have BuABs do all have some vitality and viability through the jobs they offer, services they provide and for the sheer fact of being a focal point for people and activity. More development can result in more people and activity and as such can help support services and activity, though with the caveat that the quality and nature of a service can be far more important than just a local catchment population.</p> <p>Option 1 – This option will facilitate some development and is therefore seen as having positive impacts.</p> <p>Option 2 – This option is similar to Option 1, and will facilitate some development and is therefore seen as having positive impacts.</p> <p>Option 3 – This option, in comparative terms, is likely to have less positive impacts because it would limit the scope for development and as such would provide for fewer or lower levels of development and fewer people, reducing the overall effect to neutral.</p> <p>Option 4 – This option would result in the highest levels of development and as such should be most likely to generate positive benefits. However, this does presuppose that new residents, for example, will use local facilities. If people are car dependent, being remote from village facilities, then they may not choose to drive to facilities but instead could travel further afield.</p>

SA Objective	Option 1	Option 2	Option 3	Option 4	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option 1 - Core features to define boundary; 2 - Pedestrian accessibility; 3 - Tighter Boundaries & 4 - Larger Boundaries.
20. To encourage and accommodate both indigenous and inward investment.	0	0	-	+	<p>Development of any sort can promote jobs, through construction, especially relevant in housing, and through operational activity such as the running of a shop or a workshop or business premises.</p> <p>Option 1 – This option will provide for some development but not as much as others and is, therefore, seen as having no significant impacts.</p> <p>Option 2 – This option is similar to Option 1 in terms of no significant impacts.</p> <p>Option 3 – This option, in comparative terms, is likely to have negative impacts because it would act as a constraint on scope for development and as such would provide for fewer or lower levels of development and fewer people.</p> <p>Option 4 – This option would result in the highest levels of development and as such should be most likely to generate positive benefits.</p>

Appraisal Matrix of Options for Greendale and Hill Barton Business Parks

SA Objective	Option A: Identify BUABs allowing expansion of Greendale/ Hill Barton Business Parks	Option B: Do not identify BUABs at Greendale/ Hill Barton Business Parks	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	0	0	The identification of BUABs at Greendale and Hill Barton Business Parks is not considered likely to have an effect on this objective.
2. To ensure that all groups of the population have access to community services.	0	0	The identification of BUABs at Greendale and Hill Barton Business Parks is not considered likely to have an effect on this objective.
3. To provide for education, skills and lifelong learning	0	0	Allowing for further growth at the business parks could potentially provide for skills through apprenticeship opportunities, but a negligible effect is likely.
4. To improve the population's health	0	0	The identification of BUABs at Greendale and Hill Barton Business Parks is not considered likely to have an effect on this objective.
5. To reduce crime and fear of crime.	0	0	The identification of BUABs at Greendale and Hill Barton Business Parks is not considered likely to have an effect on this objective.

SA Objective	Option A: Identify BUABs allowing expansion of Greendale/ Hill Barton Business Parks	Option B: Do not identify BUABs at Greendale/ Hill Barton Business Parks	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	0	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic – this is likely given the rural location. A cumulative effect on noise levels is possible where several developments are delivered, particularly given the nature of activities on the business parks. However, the isolated location of the business parks limits the number of people that would be exposed to noise pollution. Identifying a BUAB allowing expansion would mean a minor negative effect, with some uncertainty depending on the scale/nature of future growth. A negligible effect for not identifying a BUAB.
7. To maintain and improve cultural, social and leisure provision.	0	0	The identification of BUABs at Greendale and Hill Barton Business Parks is not considered likely to have an effect on this objective.
8. To maintain and enhance the historic environment, heritage assets and their settings.	0 ?	0	Both business parks contain a single Grade II listed building, with one or two others located just beyond. Identifying a BUAB allowing expansion (Option A) may give rise to negative effects, although the limited range of designated heritage assets along with mitigation of adverse impacts through applying NPPF and Local Plan policies means that these are likely to be negligible, with some uncertainty. Resisting further development at the business parks (Option B) would mean negligible effects.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	-	+	Whilst the Business Parks fall outside of the Areas of Outstanding Natural Beauty (AONBs) they are nonetheless in attractive countryside locations. Hill Barton lies on flatter land and closer to the A3052. Greendale, with much of the existing business park sitting in a valley floor, is in a more undulating setting and is closer to the East Devon ANOB which is under 2 kilometres away (under 1.2 miles). Further development and expansion at either Greendale or Hill Barton would lead to loss of open countryside, and therefore a negative effect is given for Option A. Resisting further development at the business parks (Option B) would mean a positive effect on this objective.

SA Objective	Option A: Identify BUABs allowing expansion of Greendale/ Hill Barton Business Parks	Option B: Do not identify BUABs at Greendale/ Hill Barton Business Parks	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
10. To maintain the local amenity, quality and character of the local environment.	-	+	Option A would result in a minor negative impact on the local environment due to increased noise during construction and increased vehicular traffic upon completion of new business units. Resisting further development at the business parks (Option B) would mean a positive effect on this objective.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	- ?	+	<p>The business parks are within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA. Given the closer proximity of the Heaths (approx 2-3km west, south west of Greendale), there are potential adverse effects from allowing greater development at Greendale in particular, through additional vehicle emissions generated from economic activity at the business parks. However, there is some uncertainty on this effect. A County Wildlife Site is located around 700m south east of Greendale.</p> <p>The NPPF and Local Plan policies will provide mitigation, but a residual negative, cumulative, albeit uncertain effect is considered likely for Option A. Resisting further development at the business parks (Option B) would mean a positive effect on this objective.</p>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	--	0	<p>The isolated, countryside location of the business parks, adjacent to the A3052, means that travel by car/van/lorry is the most attractive transport mode. For anyone wishing to travel from Exeter or Sidmouth to Greendale or Hill Barton there are frequent bus services, around three per hour in either direction through most of the day. However, using the bus stops will mean crossing the busy A3052 (with limited pedestrian crossing points) when leaving/arriving at the business parks. At Greendale, the length of walk (1.3km), poor quality walking route, and gradient is further likely to discourage bus users.</p> <p>Given these points, a significant negative is identified for Option A, whilst resisting further development at the business parks (Option B) would mean negligible effects upon this objective.</p>

SA Objective	Option A: Identify BUABs allowing expansion of Greendale/ Hill Barton Business Parks	Option B: Do not identify BUABs at Greendale/ Hill Barton Business Parks	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
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.	- ?	+	Deterioration in air quality is likely through allowing additional development at the business parks. Both sites are located in areas of Grade 3 agricultural land, with a section of Grade 1 and Grade 2 west and north of Greendale, respectively, which could be lost if expansion was permitted. A negative, but uncertain effect on water quality from Option A, whilst resisting further development would at least maintain these environmental issues, so positive for Option B.
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	-	0	Additional built development (Option A) may increase greenhouse gas emissions, particularly from motor vehicles given the isolated location of the business parks. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. Overall, a negative effect if further growth is allowed, and a negligible effect for not identifying BUABs.
15. To ensure that there is no increase in the risk of flooding as a result of development.	- ?	+	Small areas of surface water flood risk exist on both business parks, whilst Greendale has a section of Flood Zone 3 that dissects the site. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. The identification of a BUAB would lead to a negative effect with some uncertainty, depending upon specific location and design of new development. Not identifying BUABs would mean a positive effect as no further development is likely.

SA Objective	Option A: Identify BUABs allowing expansion of Greendale/ Hill Barton Business Parks	Option B: Do not identify BUABs at Greendale/ Hill Barton Business Parks	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	?	?	It can be assumed that additional development will result in increased waste production, although new development may provide opportunities to establish more sustainable waste management practices. There is some uncertainty on this matter.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	+ / -	0	Whilst identifying BUABs allowing expansion at the business parks will encourage economic development, the sustainable growth of employment in East Devon is advocated through sites at the Towns and in the West End in the adopted Local Plan. The isolated location means that employment growth at the business parks will not match levels of jobs with the economically active workforce, locationally at least. Overall, mixed effects for Option A, and negligible effects for Option B.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	0	0	The isolated location of the business parks means that the vitality and viability of Towns are not likely to be significantly affected for either option.

SA Objective	Option A: Identify BUABs allowing expansion of Greendale/ Hill Barton Business Parks	Option B: Do not identify BUABs at Greendale/ Hill Barton Business Parks	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
20. To encourage and accommodate both indigenous and inward investment.	+ +	0	Identifying BUABs that would facilitate further economic growth at the business parks is likely to have significant positive effects on encouraging investment. By not identifying BUABs, effects are likely to be negligible.

Appraisal Matrix of Options for Village Centre vitality policies at Beer and Colyton

SA Objective	Option A: Define Boundary	Option B: Do not Define Boundary	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option A - Defining a Boundary/Area or Option B - Do not Do So and Rely Just on Adopted Local Plan Policies
1. To ensure everybody has the opportunity to live in a decent home.	-	+	<p>Any policy that seeks to restrict scope for house building could result in less houses overall being built and thus limit scope for people to have home to live in.</p> <p>Option A – Resisting loss to residential use could have some negative impacts on overall housing supply though impacts would be likely to be minimal. A minor negative impact is recorded.</p> <p>Option B – A minor positive impact is possible on housing supply if there is more scope to allow for housing development though conversion or redevelopment.</p>
2. To ensure that all groups of the population have access to community services.	+	-	<p>Shops and commercial premises are of importance to communities and any loss would typically be seen as adverse.</p> <p>Option A – By resisting loss a positive impact is recorded.</p> <p>Option B – Any loss of facilities could adversely impact on people's ability to access services.</p>
3. To provide for education, skills and lifelong learning	+	-	<p>Within the central areas there are some premises or facilities that contribute to education and learning and their loss could have adverse impacts.</p> <p>Option A – By resisting loss a positive impact is recorded.</p> <p>Option B – Any loss of facilities could adversely impact on people.</p>
4. To improve the population's health	+	-	<p>Being able to access facilities and services typically support better health outcomes, especially where people walk or cycle to facilities.</p> <p>Option A – By resisting loss a positive impact is recorded.</p> <p>Option B – Any loss of facilities could adversely impact on people.</p>

SA Objective	Option A: Define Boundary	Option B: Do not Define Boundary	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option A - Defining a Boundary/Area or Option B - Do not Do So and Rely Just on Adopted Local Plan Policies
5. To reduce crime and fear of crime.	0	0	<p>Vibrant centres with lots of human activity may deter crime, but under policy choices any difference are at most probably marginal.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	?	?	<p>Commercial uses can be noisy and intrusive and as such can have adverse impacts, such impacts are less likely to occur from residential use.</p> <p>Option A – It could be possible that negative impacts may arise by resisting loss to residential development but it would depend on local circumstances and proximity of any use generating adverse impacts to any receptor.</p> <p>Option B – If uses generating adverse impacts are lost to less intrusive uses then it could be that positive impacts would arise. However, much would typically depend on local circumstances.</p>
7. To maintain and improve cultural, social and leisure provision.	+	-	<p>Within the central areas there are some premises or social, cultural and leisure activity.</p> <p>Option A – By resisting loss a positive impact is recorded.</p> <p>Option B – Any loss of facilities could adversely impact on people.</p>
8. To maintain and enhance the historic environment, heritage assets and their settings.	+	-	<p>The central areas of Beer and Colyton are of historic interest and conversion or redevelopment to residential use could have adverse impacts.</p> <p>Option A – By resisting scope for conversion or redevelopment a positive impact is recorded.</p> <p>Option B – conversion or redevelopment could have adverse impacts.</p>

SA Objective	Option A: Define Boundary	Option B: Do not Define Boundary	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option A - Defining a Boundary/Area or Option B - Do not Do So and Rely Just on Adopted Local Plan Policies
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
10. To maintain the local amenity, quality and character of the local environment.	+	-	<p>The central areas of Beer and Colyton, by containing a mix of retail and commercial uses, add to the character of the settlements and loss could be detrimental.</p> <p>Option A – By resisting potential for losses a positive impact is recorded.</p> <p>Option B – loss could have adverse impacts though it would depend on the character and nature of the facility that is lost.</p>
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	-	<p>The central areas of Beer and Colyton are used by residents and visitors alike (especially Beer). With lots of shops and services they do form a focal point for activities that are accessible by pedestrians.</p> <p>Option A – policy retaining facilities would positively serve this objective.</p> <p>Option B – any loss of facilities could be likely to generate more car trips and therefore more car use.</p>

SA Objective	Option A: Define Boundary	Option B: Do not Define Boundary	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option A - Defining a Boundary/Area or Option B - Do not Do So and Rely Just on Adopted Local Plan Policies
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.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
15. To ensure that there is no increase in the risk of flooding as a result of development.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>

SA Objective	Option A: Define Boundary	Option B: Do not Define Boundary	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option A - Defining a Boundary/Area or Option B - Do not Do So and Rely Just on Adopted Local Plan Policies
16. To ensure energy consumption is as efficient as possible.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	0	0	<p>Scope or otherwise for conversion or redevelopment is not likely to have any real impacts on this objective.</p> <p>Option A – No significant impacts are identified.</p> <p>Option B – No significant impacts are identified.</p>
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	+	+ / -	<p>The centres of Beer and Colyton do provide for a number of jobs and therefore are of some economic importance.</p> <p>Option A – Given the role of the centres in terms of job provision a policy to resist loss is identified as having positive benefits.</p> <p>Option B – Any loss of commercial uses could have negative impacts in terms of a centres overall performance but there could be shorter term benefits through work in the building and construction industries.</p>
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	-	<p>The centres of Beer and Colyton are commercially vibrant.</p> <p>Option A – Policy to promote commercial activity is seen as positive.</p> <p>Option B – detrimental impacts would result from losses.</p>

SA Objective	Option A: Define Boundary	Option B: Do not Define Boundary	Commentary/Explanation (to include secondary, cumulative, Synergistic, short, medium and long term, permanent and temporary, positive and negative effects) : Option A - Defining a Boundary/Area or Option B - Do not Do So and Rely Just on Adopted Local Plan Policies
20. To encourage and accommodate both indigenous and inward investment.	+	+ / -	<p>The centres of Beer and Colyton are of economic importance.</p> <p>Option A – Given the role of the centres in terms of job provision a policy to resist loss is identified as having positive benefits.</p> <p>Option B – Any loss of commercial uses could have negative impacts in terms but depend on circumstances there maybe offsetting, at least to some degree, benefits in the building and constructions sectors.</p>

Appraisal Matrix of Policy VP01 and Village Built-up Area Boundaries

Sustainability Appraisal of Policy VP01 – Built-up Area Boundaries

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The policy provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB at the identified settlements. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the policy provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	The settlements in policy VP01 were selected because they offer a range of services and facilities, which can be accessed by new residents. The identified BUABs ensure new development will be within reasonable walking distance of these services. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	All of the settlements in policy VP01 have a primary school, which will provide for education needs of younger children. Only Broadclyst has a secondary school so secondary-aged children and those wishing to attend college in the other settlements would need to travel elsewhere. Some of the primary schools are approaching capacity, so some uncertainty with regards to impacts upon school capacity.
4. To improve the population's health	+	Several of the settlements listed offer healthcare facilities, which can be accessed by new residents. A range of recreation opportunities are also available. The BUABs referenced in the policy ensures that new development should be within reasonable walking distance to these facilities – such activity can help to improve the population's health. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.
5. To reduce crime and fear of crime.	0	The policy is not considered likely to have an effect on this objective. NPPF and Local Plan policies should ensure that new development is well-designed, which can include reducing crime and fear of crime.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development at the listed settlements could increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified as development is likely to be small scale, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	The settlements in the policy offer a range of cultural, social and leisure facilities. The identification of BUABs at the settlements listed will ensure new residents have access to these facilities and, through their use, maintain and improve them. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	Most of the settlements have a conservation area, with notable concentrations of listed buildings in Colyton, Broadclyst, East Budleigh, Sidbury, Whimble and Woodbury. Existing policies in the NPPF and Local Plan provide mitigation to ensure that heritage assets are conserved and enhanced. Overall, a negative, albeit uncertain, cumulative effect is likely through identifying BUABs at the settlements, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	0 ?	Around half of the settlements listed are within an AONB; namely Beer, East Budleigh, Kilmington, Musbury, Newton Poppleford, Sidbury and Uplyme; with Colyton adjoining the East Devon AONB. The identified BUABs reflect the core built form, which should promote the conservation and wise use of land, and protect the landscape character. Existing policies in the NPPF and Local Plan provide mitigation. Overall a negligible effect is most likely, but there is an element of uncertainty, depending upon the specific location and design of new development.
10. To maintain the local amenity, quality and character of the local environment.	- ?	A minor negative impact on this objective is possible due to increased noise during construction and/or increased vehicular traffic from new development at the identified settlements. Some uncertainty depending upon the design of individual developments, although mitigation is provided by NPPF and Local Plan policies.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Most of the settlements in the policy are within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, as stated in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB. Beer is particularly close to the European designated site Beer Quarry and Caves SAC. There are also a range of SSSI's that could also be affected. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	The settlements have been selected as offering a range of services and facilities, and the BUABs identified so these are accessible by non-car modes. However, it is recognised that some travel out of the settlements would occur, such as to the supermarket, secondary school (apart from Broadclyst), and employment. Overall, a minor positive effect against this objective.
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.	0	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. Soil quality should be maintained, and water quality is unlikely to be significantly affected given the small scale nature of new development. These effects counterbalance each other to a degree, meaning a negligible effect overall.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development at the identified settlements may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond the settlements to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	Although flood risk affects all of the identified settlements to a greater or lesser degree, the NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale and, overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the settlements will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, but employment opportunities for new residents at the identified settlements are generally limited. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely at the settlements. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of BUABs provides the opportunity for new development to support services and facilities at the identified settlements, enhancing their vitality and viability.
20. To encourage and accommodate both indigenous and inward investment.	0	Although development may encourage investment, a negligible effect is considered likely for this objective.

Beer Built-up Area Boundary

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Preferred Option	Alternative: Exclude Land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects) <i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i>
1. To ensure everybody has the opportunity to live in a decent home.	+	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Beer means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	+	Beer contains a relatively good range of community services, including shops, pubs, restaurants, Post Office, doctor's surgery and a primary school. The identified BUAB ensures new development will be within reasonable walking distance, albeit the nature of the Village means that steep inclines could deter some groups of the population (e.g. elderly, those with wheelchairs and buggies). A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	+ ?	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is at capacity, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.
4. To improve the population's health	+	+	A doctor's surgery and pharmacy, both located in the village centre, mean that the delineation of the BUAB facilitates access to health care facilities. The BUAB also ensures that new development should be within reasonable walking distance to these facilities (although the gradient is steep in places) – such activity can help to improve the population's health. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.
5. To reduce crime and fear of crime.	0	0	Beer BUAB is not considered likely to have an effect on this objective.

SA Objective	Preferred Option	Alternative: Exclude Land in West of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified due to the likely small-scale nature of new development in the BUAB, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	The presence of art galleries, a Heritage Centre, leisure clubs, restaurants and other community facilities in Beer, mean that the BUAB will have a positive effect on this objective.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	- ?	Beer BUAB contains a Conservation Area, mainly comprising the historic village core, which includes around 40 listed buildings. The coast forms part of the Dorset and East Devon Coast UNESCO World Heritage Site. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	+ / - ?	Limiting the extent of the Beer BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. The East Devon AONB covers the western area of Beer, and development proposals in here will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.

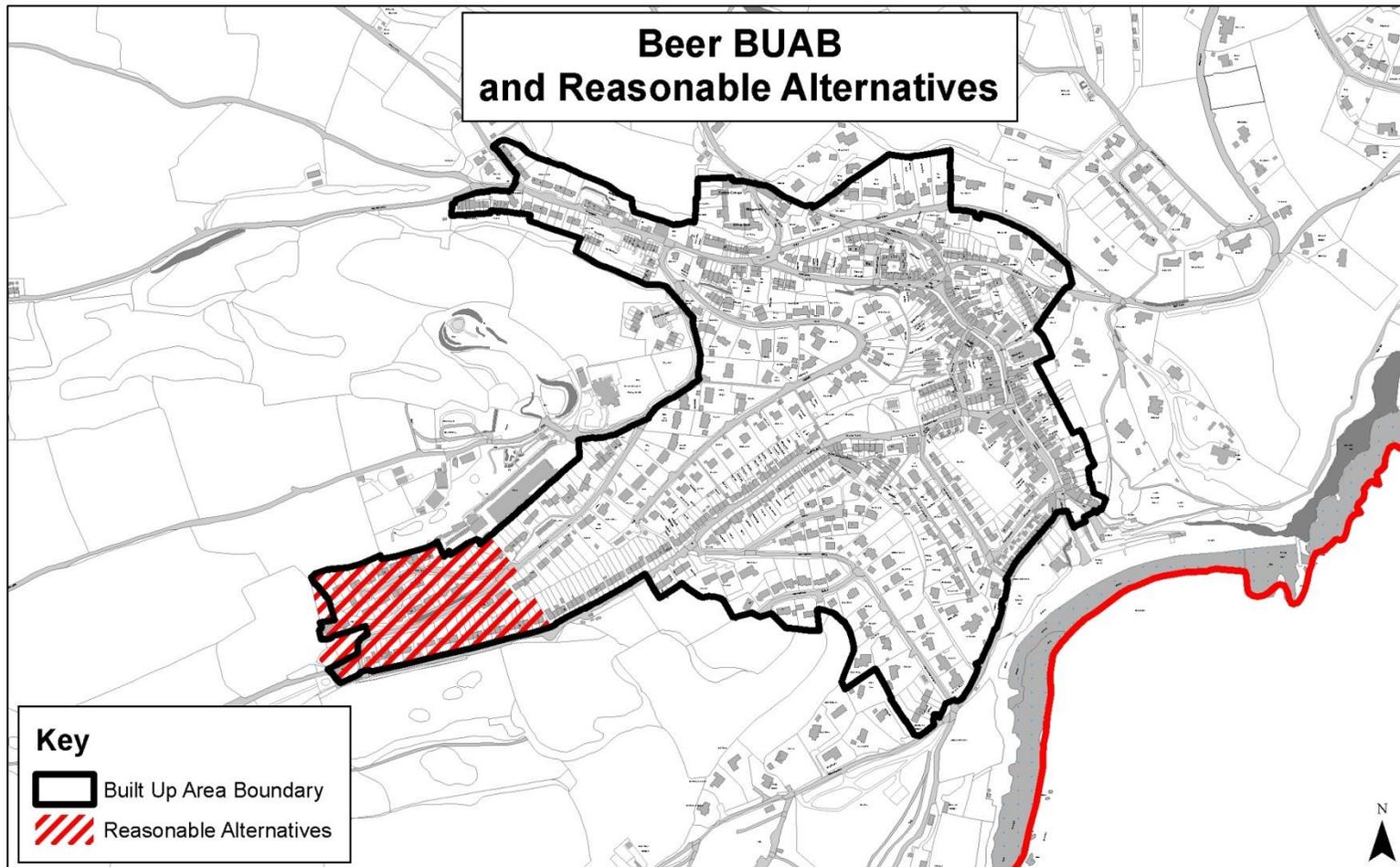
SA Objective	Preferred Option	Alternative: Exclude Land in West of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
10. To maintain the local amenity, quality and character of the local environment.	0 ?	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, although the small-scale nature means that this effect is negligible, albeit uncertain.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	The BUAB is in close proximity to Beer Quarry and Caves SAC (less than 1km from the edge of the BUAB), and the Sidmouth to West Bay SAC that follows the coast, both being protected European sites as identified in the Habitats Regulations Assessment screening. Two County Wildlife Sites are also in close proximity to the BUAB (within 300m). The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale; therefore a residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There is a relatively good range of services and facilities in Beer (including shops, pubs, restaurants, Post Office, doctor's surgery and a primary school), although the gradient is steep in places. It is recognised that some travel out of Beer would be necessary (e.g. to the supermarket, secondary school, employment) and public transport is lacking compared to larger settlements. This tempers the effect to a minor positive effect overall against this objective.

SA Objective	Preferred Option	Alternative: Exclude Land in West of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
<p>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.</p>	+	+	<p>Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall, as these issues should at least be maintained.</p>
<p>14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.</p>	0 ?	0 ?	<p>Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Greenhouse gas emissions from travel should be minimised due to level of services and facilities that are accessible within the Beer BUAB, although some travel beyond Beer to access services and employment is likely by car due to the relative lack of public transport. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect with some uncertainty depending upon specific location and design of new development.</p>

SA Objective	Preferred Option	Alternative: Exclude Land in West of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
15. To ensure that there is no increase in the risk of flooding as a result of development.	0	0	A narrow section of medium-high flood risk follows the main road through the centre of the village and out to sea. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale, potentially re-using existing buildings, so additional impermeable surfaces will be limited. Overall, a negligible effect is considered likely.
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	Jobs would be created during construction, offering a short term benefit, and the range of services and facilities in Beer offers employment opportunities for new residents. Although out-commuting is likely, this would not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Preferred Option	Alternative: Exclude Land in West of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	The identification of Beer BUAB provides the opportunity for new development to support the relatively wide range of services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	+	+	Tourism is the main economic activity in Beer, and the identified BUAB could encourage both indigenous and inward investment through additional, albeit limited, development. The exclusion of Pecorama from the BUAB provides support for the retention of this important tourist attraction.



Broadclyst Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Broadclyst means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	Broadclyst contains a relatively good range of community services, including shops, Post Office, doctor's surgery, a primary school, and a secondary school. The identified BUAB ensures new development will be within reasonable walking distance – although the main shops, doctor's and primary school, recreation facilities are to the north, and the secondary school is in the south, there are adequate footpaths, it is relatively flat and overall there are no significant barriers to walking/cycling across the village. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	++ ?	Broadclyst Primary Academy Trust is located at the northern edge of the BUAB, and provides for younger children aged 2-11. Broadclyst is unique amongst the Villages with the presence of a secondary school (Clyst Vale Community College), giving access for those aged 11-18 in the BUAB and surrounding area. The primary school is at capacity, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity. Given these facilities, a significant positive effect is likely in identifying the BUAB, albeit uncertain.
4. To improve the population's health	+	A doctor's surgery provides access to health care facilities. The delineation of the BUAB ensures that people can walk to reach community facilities – such activity can help to improve the population's health. Recreation areas are located around the village, and the proposed Clyst Valley Regional Park is adjacent to the BUAB and will provide further opportunities to improve people's health if delivered in the future. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.
5. To reduce crime and fear of crime.	0	Broadclyst BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified due to the likely small-scale nature of new development in the BUAB, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	Broadclyst contains a small range of shops, a Post Office, restaurant, and two schools (primary and secondary). Broadclyst Leisure Centre provides further opportunities for social and leisure provision. Therefore, the identification of the BUAB will lead to a positive effect on this objective.
8. To maintain and enhance the historic environment, heritage assets and their settings.	0 ?	There is a conglomeration of heritage assets in the northern part of the BUAB and just beyond, with a Conservation Area and numerous listed buildings. The Grade I listed church is excluded from the BUAB, which will help maintain and enhance this asset. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A negligible, albeit uncertain, effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ ?	Limiting the extent of the Broadclyst BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. There is an element of uncertainty, depending upon the specific location and design of new development, but there are no nationally designated landscapes that would be impacted by development in the BUAB.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, although the small-scale nature means that this effect is negligible, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Broadclyst is within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, and therefore mitigation will be required from new development in the BUAB, as stated in the HRA Screening Report. In addition, a County Wildlife Site is located around 800m to the south west of the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Broadclyst (including shops, Post Office, doctor's surgery, primary and secondary schools), although it is recognised that some travel out of Broadclyst would be necessary (e.g. to the supermarket, employment). Public transport is relatively good in Broadclyst, with a regular (3 per hour during the working day) service to Exeter City Centre. Overall, a minor positive effect against this objective.
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.	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Greenhouse gas emissions from travel should be minimised due to level of services and facilities that are accessible within the Broadclyst BUAB, although some travel beyond Broadclyst to access services and employment is likely by car. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	The BUAB does not include any areas of medium-high fluvial flood risk (Flood Zones 2 and 3), although the River Clyst runs to the north and west of the village. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale, potentially re-using existing buildings, so additional impermeable surfaces will be limited. Overall, a negligible effect with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, and there are some services and facilities in Broadclyst that could offer employment opportunities for new residents. Although out-commuting is likely, particularly to nearby Exeter, this would not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of Broadclyst BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	Broadclyst BUAB is not considered likely to have an effect on this objective.

Clyst St Mary Built-up Area Boundary

SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
1. To ensure everybody has the opportunity to live in a decent home.	+	+	<p>The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. The BUAB includes the Winslade Park Local Plan allocation for 150 dwellings, and 80 dwellings have been approved and are under construction to the east of the village hall. However, given that these sites are already planned/under construction, the identification of the BUAB is not contributing to their delivery. Overall, a long term, permanent, positive effect is likely.</p>
2. To ensure that all groups of the population have access to community services.	+	+	<p>Although access to a basic level of community services such as a primary school, post office/shop, and pub is possible within Clyst St Mary, these are all located in the north of village. The busy A3052 divides the village, meaning that those living to the south have further to travel (over 1km from Winslade Park), over the non-ramped pedestrian footbridge or traffic-lighted pedestrian crossing. Despite these issues, overall a long term (assuming the facilities remain), permanent, positive effect is likely against this objective.</p> <p>The flat topography and presence of pedestrian footpaths mean that it would still be reasonable to walk from Winslade Park, and the significant effects of this alternative are considered to be the same as the preferred BUAB.</p>
3. To provide for education, skills and lifelong learning	+ ?	+ ?	<p>The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is approaching capacity, so there is some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.</p>
4. To improve the population's health	0	0	<p>The delineation of the BUAB ensures that people can walk to reach community facilities, although Clyst St Mary does not have a doctor's surgery. Outdoor sports pitches are present in the village. The proposed Clyst Valley Regional Park is adjacent to the north of the BUAB and will provide further opportunities to improve people's health once completed in the future. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. The lack of health care facilities (doctor's, pharmacy, dentist) in Clyst St Mary reduces the effect to negligible.</p>

SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
5. To reduce crime and fear of crime.	0	0	Clyst St Mary BUAB is not considered likely to have an effect on this objective.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. Traffic along the A3052 already causes a degree of background noise. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	The BUAB includes a basic range of social provision (primary school, shop, post office, pub), and outdoor sports pitches. The proposed Clyst Valley Regional Park is adjacent and may offer leisure opportunities in the future. A minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	0	0	There are relatively few designated heritage assets in Clyst St Mary, highlights being Grade II* listed building at Winslade Park and a Scheduled Monument bridge on the north east edge of the BUAB. A negligible effect is therefore expected.

SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	0 ?	0 ?	The extent of the Clyst St Mary BUAB largely reflects the existing built form, apart from a Greenfield site that already has planning permission for 80 dwellings to the east of the village hall which tempers the effect to negligible. There is an element of uncertainty, depending upon the specific location and design of new development, but there are no nationally designated landscapes that would be impacted by development in the BUAB.
10. To maintain the local amenity, quality and character of the local environment.	-	-	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, particularly given the two large sites included in the BUAB that are still to be delivered. The A3052 which dissects the village already detracts from local amenity.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	Clyst St Mary is within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, and therefore mitigation will be required from new development in the BUAB, as stated in the HRA Screening Report. A County Wildlife Site adjoins the north west edge of the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.

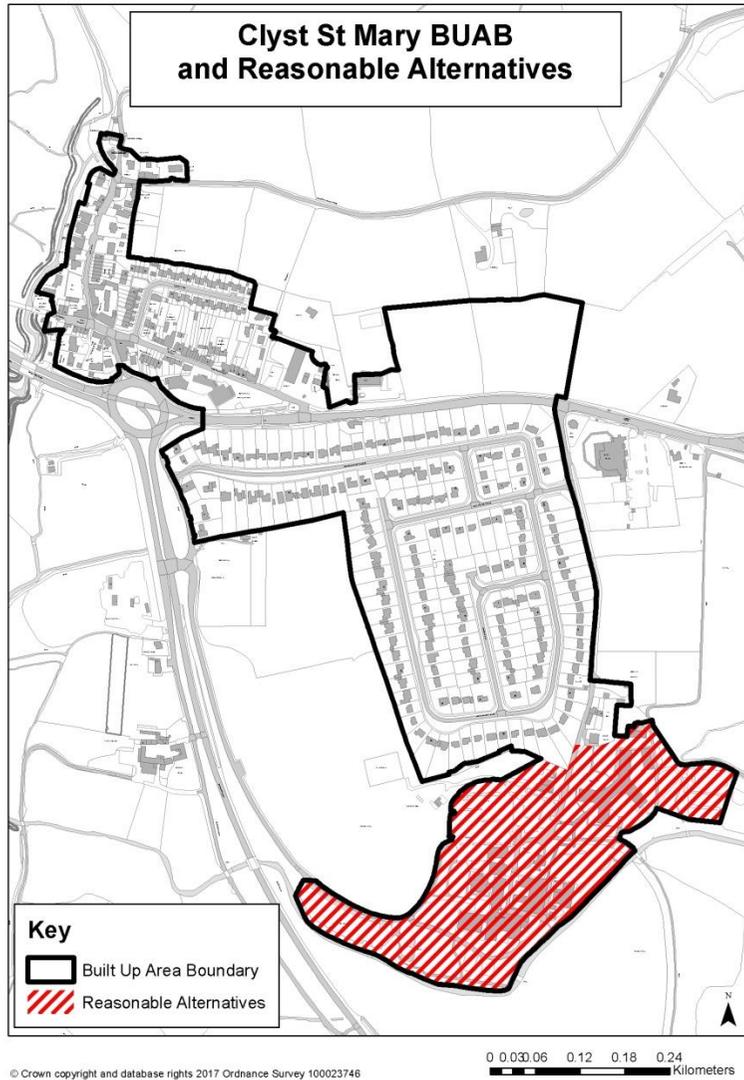
SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
<p>12. To promote and encourage non-car based modes of transport and reduce journey lengths.</p>	+	+	<p>A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Clyst St Mary (including shops, Post Office, doctor's surgery, primary school), although it is recognised that some travel out of Clyst St Mary would be necessary (e.g. to the supermarket, secondary school, employment). Public transport is relatively good in Clyst St Mary, with a regular (3 per hour during the working day) service to Exeter City Centre from bus stops on the A3052. Overall, a minor positive effect against this objective is expected.</p> <p>The flat topography and presence of pedestrian footpaths mean that it would still be reasonable to walk from Winslade Park, and the significant effects of this alternative are considered to be the same as the preferred BUAB.</p>
<p>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.</p>	-	-	<p>Air quality may be adversely affected if new development increases vehicle movements, which is considered likely given that the BUAB straddles the A3052. The incorporation of a Greenfield site with planning permission for 80 dwellings to the east of the village hall in the BUAB, which is partly grade 1 agricultural land quality, means a minor negative effect is expected.</p>

SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Clyst St Mary to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	0 ?	North western parts of the BUAB are within an area of high fluvial flood risk (Flood Zone 3) associated with the River Clyst. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale, apart from the Local Plan allocated site at Winslade Park and land east of the village hall. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.

SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	-	-	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Clyst St Mary that could offer employment opportunities for new residents. Out-commuting from new residents is likely, particularly being located on a main road to nearby Exeter. The boundary encompasses the allocated Winslade Park (150 dw) and the permitted site east of the village hall (80 dw), a relatively high level of housing growth, so a negative effect is likely.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	The identification of Clyst St Mary BUAB provides the opportunity for new development to support services and facilities in the village.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Preferred Option	Alternative: Exclusion of land at Winslade Park	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
20. To encourage and accommodate both indigenous and inward investment.	0	0	Clyst St Mary BUAB is not considered likely to have an effect on this objective.



Colyton Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	Colyton contains a relatively good level of community services, including a range of shops, pubs, restaurants, Post Office, doctor's surgery and a primary school. The identified BUAB ensures new development will be within reasonable walking distance. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere (possible to nearby Colyton Grammar although this is a selective secondary school). There is some capacity at the primary school for additional pupils. A library is located in the centre of the village.
4. To improve the population's health	+	A doctor's surgery and pharmacy, both located in or near to the village centre, mean that the delineation of the BUAB facilitates access to health care facilities. The BUAB also ensures that new development should be within reasonable walking distance to these facilities – such activity can help to improve the population's health. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.
5. To reduce crime and fear of crime.	0	Colyton BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified due to the likely small-scale nature of new development in the BUAB, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	Colyton has a good provision of cultural, social and leisure facilities, including the primary school, library, shops, restaurants, pubs, and sports pitches. The identification of the BUAB will maintain and improve these facilities, resulting in a long term, permanent positive effect.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	Colyton is an historic settlement with a large Conservation Area covering the village centre containing around 60 listed buildings, including the Grade I listed St Andrews church. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	Limiting the extent of the Colyton BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. The inclusion of the former 'Ceramtec' factory within the BUAB provides an opportunity to re-use previously developed land. The East Devon AONB adjoins the northern edge of the BUAB, and runs close to the east of the village. Therefore, development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic from new development, although the likely small-scale nature means that this effect is negligible, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Colyton BUAB has the potential to impact upon the River Axe SAC through development potentially affecting water quality, with this European protected site around 1km from the BUAB. There could also be impacts upon Beer Quarry and Caves SAC, approximately 5km away, particularly the bat commuting/foraging routes and bat sustenance zones. These issues are discussed in the HRA Screening Report. Bolshayne Fen SSSI is 1.8km to the west. Two County Wildlife Sites are within 1km of the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale; therefore a residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There is a good range of services and facilities in Colyton (including shops, pubs, restaurants, Post Office, doctor's surgery, library, and a primary school), although it is recognised that some travel out of Colyton would be necessary (e.g. to the supermarket, secondary school, employment) and public transport is lacking compared to larger settlements with an hourly bus service to Axminster and a less frequent service (every 2-3 hours) to Honiton. This tempers the effect to a minor positive effect overall against this objective.
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.	- ?	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB only includes two small Greenfield sites with existing planning permission, so soil quality should be maintained. The proximity (1km) to the River Axe means that water quality could potentially be affected, although there is some uncertainty depending upon specific development details. There is potential for a negative effect, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Greenhouse gas emissions from travel should be minimised due to level of services and facilities that are accessible within the Colyton BUAB, although some travel beyond Colyton to access services and employment is likely by car due to the relative lack of public transport. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	An area of high flood risk (FZ 3) associated with the River Coly affects the north east of the BUAB, and follows the eastern boundary of the village. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale, potentially re-using existing buildings, so additional impermeable surfaces will be limited. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB, particularly the former 'Ceramtec' factory, would have a positive effect.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, and the range of services and facilities in Colyton offers employment opportunities for new residents. Although out-commuting is likely, this would not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of Colyton BUAB provides the opportunity for new development to support the relatively wide range of services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	+	The identified BUAB could encourage both indigenous and inward investment through additional, albeit limited, development that could build upon existing businesses in the settlement.

East Budleigh Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at East Budleigh means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	East Budleigh contains a reasonable level of services, with pubs, a community shop, a community hall, and a primary school. The identified BUAB ensures new development will be within reasonable walking distance. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. There is capacity at the primary school for additional pupils.
4. To improve the population's health	0	The delineation of the BUAB ensures that people can walk to reach community facilities, although East Budleigh does not have a doctor's surgery or pharmacy – these can be accessed in Budleigh Salterton nearby. A tennis court, football pitch and allotments provide recreation opportunities. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. The lack of health care facilities (doctor's, pharmacy, dentist) in East Budleigh reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	East Budleigh BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	East Budleigh has a range of cultural, social and leisure facilities, with a primary school, shop, pub, community hall, tennis court, football pitches and allotments. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	A Conservation Area is located in the north west of the BUAB, with a concentration of listed buildings including the Grade I listed church. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. Nevertheless, East Budleigh BUAB and the surrounding area is entirely within the East Devon AONB, and development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic from new development, although the likely small-scale nature means that this effect is negligible, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	East Budleigh is within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, as stated in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB. The Otter Estuary SSSI is located around 700m south east of the BUAB, with a County Wildlife Site slightly closer (400m to south east). The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in East Budleigh (including primary school, shop, pub, community hall), although it is recognised that some travel out of the village would be necessary (e.g. to the supermarket, employment, secondary school). An hourly bus service provides links to Exmouth and Sidmouth, where is it possible to access a wider range of services. Overall, a minor positive effect against this objective.
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.	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond East Budleigh to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	An area of high flood risk associated with the Budleigh Brook runs along the west and south of the BUAB before it joins the River Otter. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in East Budleigh that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of East Budleigh BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	East Budleigh BUAB is not considered likely to have an effect on this objective.

Feniton Built-up Area Boundary

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	+	++	<p>The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Feniton means that this effect is not considered to be significant.</p> <p>The inclusion of land around Sherwood Cross, a large site with developer interest for housing (31 ha with potential for around 540 dwellings) means a long term, permanent significant positive effect for this alternative.</p>
2. To ensure that all groups of the population have access to community services.	+	-	+	<p>Feniton BUAB has a basic level of community services, including a primary school, pub, and a shop. The identified BUAB ensures new development will be within reasonable walking distance. A long term (assuming the facilities remain), permanent, positive effect is likely.</p> <p>The lack of community facilities in the 'old' village, mean a negative effect for this alternative.</p>
3. To provide for education, skills and lifelong learning	+ ?	+ / - ?	+ ?	<p>The presence of a pre-school and primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is already at capacity, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.</p> <p>The alternative to include land around Sherwood Cross additionally would mean a negative, uncertain effect, due to the potential for large scale development.</p>

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
4. To improve the population's health	0	0	0	The delineation of the BUAB is within reasonable walking distance of community facilities. Feniton does not have a doctor's surgery or pharmacy, but a dentist is present. Sports pitches and allotments provide recreation opportunities. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. The lack of health centre in Feniton reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	0	0	Feniton BUAB is not considered likely to have an effect on this objective.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	+	Feniton has a basic range of cultural, social and leisure facilities, with a primary school, shop, pub, and sports pitches; which new development in the BUAB could help support. Given this, a minor positive effect is considered likely.

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
8. To maintain and enhance the historic environment, heritage assets and their settings.	0	- ?	- ?	<p>Feniton BUAB does not contain a Conservation Area or any listed buildings, reflecting the fact that it largely constitutes buildings from the later part of the 20th century. In fact, there are no designated heritage assets in or adjoining the BUAB, and therefore a negligible effect is identified for the preferred option.</p> <p>There are around 15 Grade II listed buildings in and around the core of the 'old' village, including one listed Grade II*, meaning a negative effect, with some uncertainty subject to detailed scheme design.</p> <p>The presence of two Grade II listed buildings on land around Sherwood Cross means that a negative effect, with some uncertainty subject to detailed scheme design. NPPF and Local Plan policies require mitigation of adverse impacts.</p>
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ ?	+ ?	-	<p>Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. There is an element of uncertainty, depending upon the specific location and design of new development, but there are no nationally designated landscapes that would be impacted by development in the BUAB.</p> <p>Land at Sherwood Cross is a large Greenfield site with potential for housing, contrary to this objective.</p>

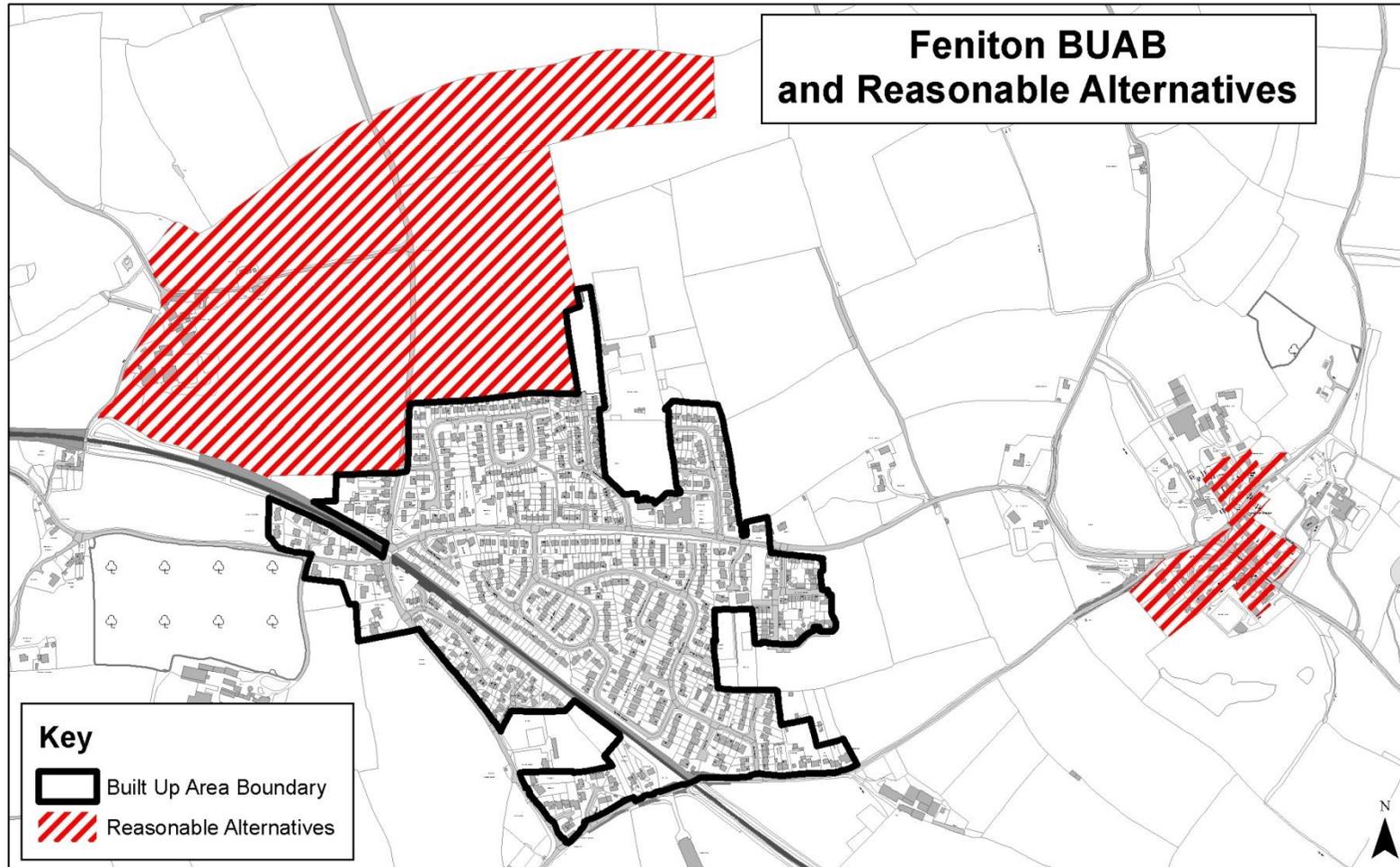
SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
10. To maintain the local amenity, quality and character of the local environment.	0 ?	0 ?	-	<p>A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, although the small-scale nature means that this effect is negligible, albeit uncertain.</p> <p>Land at Sherwood Cross is a large Greenfield site with potential for housing, contrary to this objective</p>
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	-	<p>Feniton is within 10km of the East Devon Pebblebed Heaths SAC, as identified in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB. Escot Park County Wildlife Site is just under a mile to the south west. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.</p>

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	-	+	<p>A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Feniton (including shop, pub, primary school), although it is recognised that some travel out of the village would occur (e.g. to the supermarket, secondary school, employment) and Feniton currently fulfils something of a dormitory function. Feniton is one of only two villages that benefits from a train station, offering services to Exeter and London Waterloo. Bus services are infrequent. Overall, a minor positive effect against this objective.</p> <p>The alternative to include the 'old' village is lacking services, with poor pedestrian links to the main village and train station – therefore, a negative effect.</p>
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.	+	+	- ?	<p>Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall for the preferred option.</p> <p>The alternative to include land at Sherwood Cross is likely to adversely affect air quality through increased vehicle movements, particularly given the inclusion of a large Greenfield site with potential for housing – this site would also mean the loss of around 31 ha of Grade 1 and 2 agricultural land. Overall a negative effect, with some uncertainty as to the potential effect on water quality for this alternative.</p>

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	-	<p>Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Feniton to access services and employment is likely by car (although the train station will reduce car travel), which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.</p> <p>The inclusion of land around Sherwood Cross, a large Greenfield site with potential for housing, would lead to a much larger increase in greenhouse gas emissions, leading to a negative effect.</p>
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	0 ?	- ?	<p>There are no areas of medium-high (FZs 2 or 3) fluvial flood risk in the BUAB, although parts of the village are at risk of surface water flooding, which has occurred in the past. Feniton is within a 'critical drainage area' meaning that new development should reduce current run-off rates. Current and programmed works to improve the drainage infrastructure should address these problems. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale and, overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.</p> <p>The alternative to include land around Sherwood Cross, a large Greenfield site with potential for housing,, means a negative effect is considered likely with some uncertainty, depending upon the design of new development here.</p>

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
16. To ensure energy consumption is as efficient as possible.	0	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establish more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	-	<p>Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Feniton that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.</p> <p>The alternative to include land around Sherwood Cross, a large Greenfield site with potential for housing,, means that out-commuting from new residents to a greater degree, leading to a negative effect against this objective.</p>

SA Objective	Preferred Option	Alternative: Include land around the 'old' Village	Alternative: Include land around Sherwood Cross, north west of Feniton	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	++ ?	<p>The identification of Feniton BUAB provides the opportunity for new development to support services and facilities in the village.</p> <p>The alternative to include land around Sherwood Cross, with potential for around 540 dwellings, offers potential for greater enhancement of vitality and viability through higher population numbers, although there is some uncertainty as to whether this would be a significant positive effect, depending upon individuals' behaviour on using local services.</p>
20. To encourage and accommodate both indigenous and inward investment.	0	0	0	Feniton BUAB is not considered likely to have an effect on this objective.



Kilminster Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Kilminster means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	Kilminster contains a reasonable level of services, with pubs, a shop/post office, a village hall, and a primary school. In addition, a farm shop is just to the north of the BUAB, albeit across the busy A35 which does not have a dedicated crossing, and a garage with shop and cafe is adjacent to the north east. The identified BUAB ensures new development will be within reasonable walking distance. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is currently at capacity, although projected numbers are due to reduce there is some uncertainty so there is some uncertainty on this issue.
4. To improve the population's health	0	The delineation of the BUAB ensures that people can walk to reach community facilities, although Kilminster does not have a doctor's surgery or pharmacy – these can be accessed in Axminster nearby. Unusually, there are three village greens, which provide recreation opportunities. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. The lack of health care facilities (doctor's, pharmacy, dentist) in Kilminster reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	Kilminster BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. Traffic along the busy A35, part of the Strategic Road Network, already causes a degree of background noise in the BUAB. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	The BUAB includes a range of social provision (primary school, shop, post office, pubs), and leisure recreational opportunities at the village greens. A minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	Kilmington has a relatively small Conservation Area at the core of the village, which includes the Grade II* listed church and eight other listed buildings. Several other listed buildings are located around the village. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. Nevertheless, the vast majority (apart from land east of Whitord Road) of Kilmington BUAB is within the East Devon AONB, and development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic from new development, although the likely small-scale nature means that this effect is negligible, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Kilmington BUAB has the potential to impact upon the River Axe SAC through development potentially affecting water quality, as stated in the HRA Screening Report, with this European protected site around 700m from the BUAB. A County Wildlife Site adjoins the north west BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale; therefore a residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Kilmington (including shop/post office, pubs, a primary school), although it is recognised that some travel out of Kilmington would occur (e.g. to the supermarket, secondary school, employment). An hourly bus service is available from a bus stop adjacent to the BUAB on the A35, to Exeter in one direction, and Axminster in the other. A Sustrans cycle route (number 2) travels through the village.
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.	- ?	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB follows the existing built form, so soil quality should be maintained. The proximity (700m) to the River Axe means that water quality could potentially be affected, although there is some uncertainty depending upon specific development details. There is potential for a negative effect, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Kilmington to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	A narrow band of high fluvial flood risk runs along the southern part of the BUAB, before flowing down to the River Axe. New development is likely to be small-scale and the NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, but there are limited employment opportunities in Kilmington for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of Kilmington BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	Kilmington BUAB is not considered likely to have an effect on this objective.

Musbury Built-up Area Boundary

SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
1. To ensure everybody has the opportunity to live in a decent home.	+	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Musbury means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	+	Musbury has a reasonable level of services, with a pub, shop, Post Office, village hall, garage, and a primary school. The identified BUAB ensures new development will be within reasonable walking distance. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+	+	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The number on the roll at the primary school is less than half of the capacity, indicating that additional children would help support the school.
4. To improve the population's health	0	0	The delineation of the BUAB ensures that people can walk to reach community facilities, although Musbury does not have a doctor's surgery or pharmacy. Allotments provide recreation opportunities. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. The lack of health care facilities (doctor's, pharmacy, dentist) in Musbury reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	0	Musbury BUAB is not considered likely to have an effect on this objective.

SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. Traffic along the A358 already causes a degree of background noise. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	Musbury has a basic range of cultural, social and leisure facilities, with a primary school, shop, Post Office, pub, and allotments. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	- ?	A Conservation Area covers the southern part of the BUAB, with around a dozen listed buildings. The Grade I listed St Michael's Church is slightly outside the BUAB. Further detail is included within a heritage assessment for the village. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.

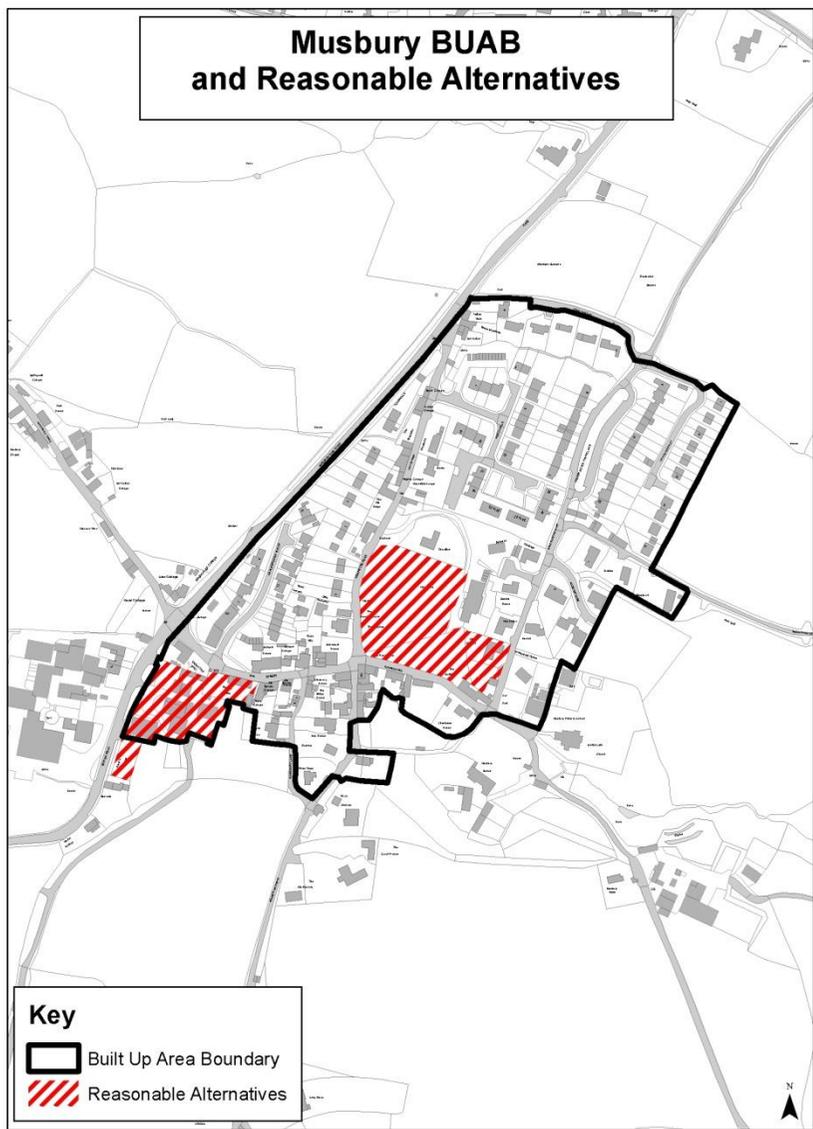
SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	+ / - ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. Nevertheless, Musbury BUAB and the surrounding area is entirely within the East Devon AONB, and development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	0 ?	The presence of the A358 already detracts from local amenity to a degree. Further detail on character of the local environment is included within a heritage assessment for the village. A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic from new development, although the likely small-scale nature means that this effect is negligible, albeit uncertain.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	Musbury BUAB has the potential to impact upon the River Axe SAC through development potentially affecting water quality, as stated in the HRA Screening Report, with this European protected site around 1km from the BUAB. A County Wildlife Site is approximately 700m to the south west. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale; therefore a residual negative, cumulative effect is considered likely.

SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Musbury (including shop, pub, primary school), although it is recognised that some travel out of the village would occur (e.g. to the supermarket, secondary school, employment). There are hourly buses north to Axminster, and south to Seaton, which are home to a greater range of services and jobs. Overall, a minor positive effect against this objective.
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.	- ?	- ?	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB follows the existing built form, so soil quality should be maintained. The proximity (1km) to the River Axe means that water quality could potentially be affected, although there is some uncertainty depending upon specific development details. There is potential for a negative effect, albeit uncertain.

SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Musbury to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	0 ?	A narrow band of high fluvial flood risk runs along the southern and northern parts of the BUAB, before flowing down to the River Axe. New development is likely to be small-scale and the NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.

SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	Jobs would be created during construction, offering a short term benefit, but there are limited employment opportunities in Musbury for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	The identification of Musbury BUAB provides the opportunity for new development to support services and facilities in the village.

SA Objective	Preferred Option	Alternative: Exclude Baxter's Farm and Land at Mountfield	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
20. To encourage and accommodate both indigenous and inward investment.	0	0	Musbury BUAB is not considered likely to have an effect on this objective.



© Crown copyright and database rights 2017 Ordnance Survey 100023746

Newton Poppleford Built-up Area Boundary

SA Objective	Preferred Option	Alternative: Include land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Newton Poppleford means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	-	Newton Poppleford contains a reasonable level of services, with a pub, a shop, Post Office, a village hall, a doctor's surgery, and a primary school. These are mostly located in the east of the village. The identified BUAB ensures new development will be within reasonable walking distance, with the western part of the settlement excluded from the BUAB for this reason. A long term (assuming the facilities remain), permanent, positive effect is likely. The alternative to include land in the west of the Village is beyond desirable walking distance and lacks of appropriate pedestrian footpaths, and is therefore less accessible to community services – a negative effect.
3. To provide for education, skills and lifelong learning	+	+	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The number on the roll at the primary school is less than the maximum, indicating that capacity exists for additional children.
4. To improve the population's health	+	+	The presence of a doctor's surgery means that the delineation of the BUAB facilitates access to health care facilities. The BUAB also ensures that new development should be within reasonable walking distance to these facilities – such activity can help to improve the population's health. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.
5. To reduce crime and fear of crime.	0	0	Newton Poppleford BUAB is not considered likely to have an effect on this objective.

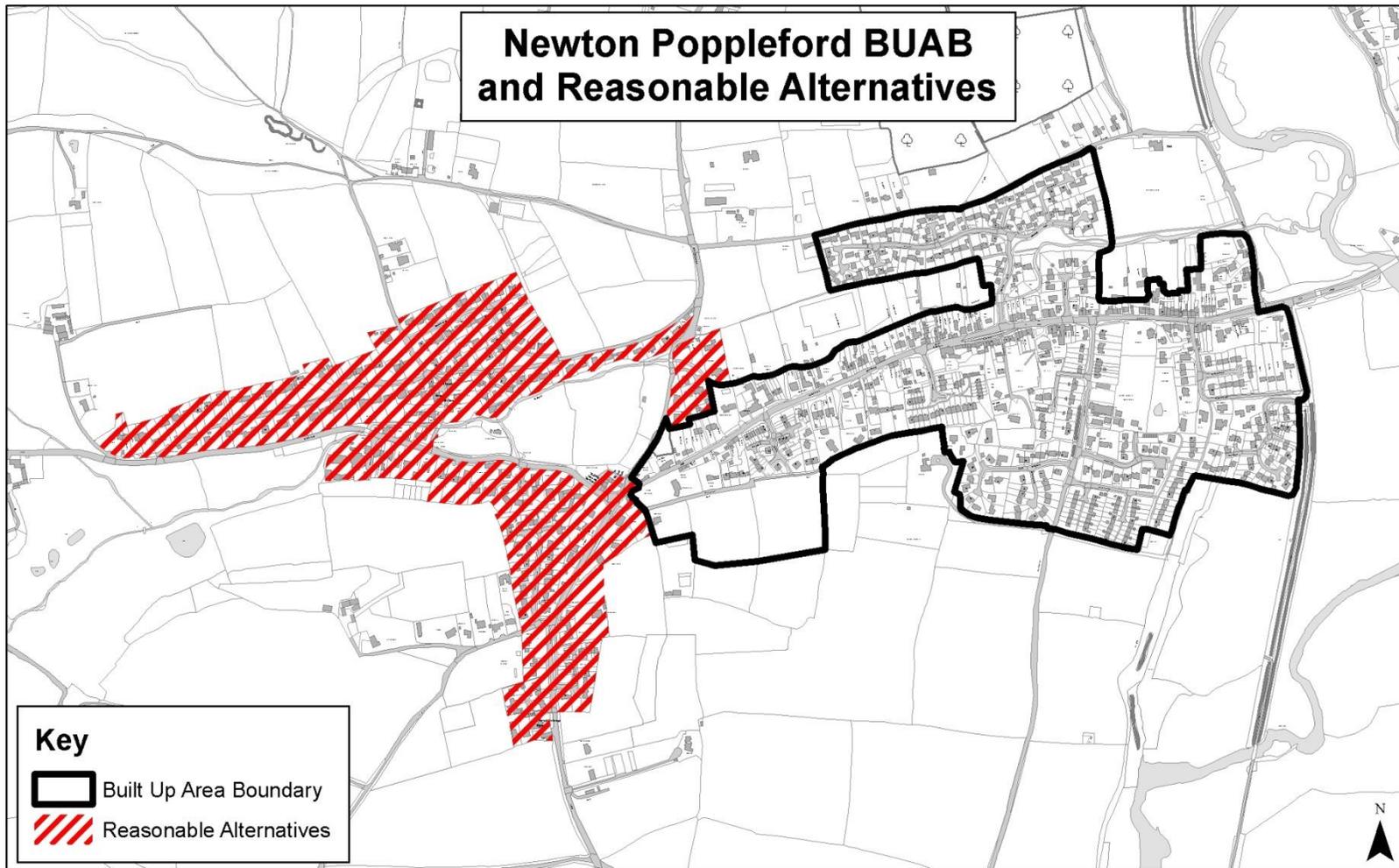
SA Objective	Preferred Option	Alternative: Include land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. The A3052 already causes a degree of background noise as it travels through the village. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified due to the likely small-scale nature of new development in the BUAB, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	Newton Poppleford has a basic range of cultural, social and leisure facilities, with a primary school, shop, Post Office, pub, restaurants, allotments, and sport pitches. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	- ?	Although the village does not have a Conservation Area, there are several listed buildings along the A3052, most notably four Grade II* listed buildings in the east of the BUAB. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	+ / - ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. Nevertheless, Newton Poppleford BUAB and the surrounding area is entirely within the East Devon AONB, and development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.

SA Objective	Preferred Option	Alternative: Include land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
10. To maintain the local amenity, quality and character of the local environment.	0 ?	0 ?	The presence of the A3052 already detracts from local amenity to a degree. A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic from new development, although the likely small-scale nature means that this effect is negligible, albeit uncertain.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	<p>East Devon Pebblebed Heaths SAC and East Devon Heaths SPA are just 600-700m from the western edge of the BUAB, well within the 10km zone (set out in Local Plan Strategy 47), and therefore mitigation will be required from new development in the BUAB. This is recognised in the HRA Screening Report. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.</p> <p>The alternative to include land in the west of the Village would bring the BUAB even closer to the Heaths, to within 200m, so adverse biodiversity impacts are even more likely, but still a minor negative effect.</p>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	-	<p>A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. Due to the distance, narrow road, and lack of good quality pavements from the western part of the village to the services/facilities in the east, land west of the A3052/B3178 junction is excluded from the BUAB. This should ensure residents from new development can walk or cycle to key services in the village. There are some services and facilities in Newton Poppleford (including medical centre, primary school, shop, pub), although it is recognised that some travel out of the village would be necessary (e.g. to the supermarket, employment, secondary school). Bus services from Newton Poppleford are relatively good, with a half hourly service to Exeter city centre to the west, and Sidmouth to the east, where it is possible to access a wider range of services. Overall, a minor positive effect against this objective.</p> <p>The alternative to include land in the west of the Village is beyond desirable walking distance and lacks of appropriate pedestrian footpaths, and will therefore not promote non-car travel – a negative effect.</p>

SA Objective	Preferred Option	Alternative: Include land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
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.	+	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB includes a Greenfield site which is Grade 2 agricultural land quality, but this already has planning permission for development. Water quality is unlikely to be significantly affected. A positive effect overall.
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Newton Poppleford to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.

SA Objective	Preferred Option	Alternative: Include land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	0 ?	An area of high flood risk associated with the Back Brook runs along the north of the BUAB before it joins the River Otter. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Newton Poppleford that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.

SA Objective	Preferred Option	Alternative: Include land in West of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	The identification of Newton Poppleford BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	0	Newton Poppleford BUAB is not considered likely to have an effect on this objective.



Sidbury Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Sidbury means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	Sidbury contains a reasonable level of services, with a pub, a shop, a village hall, and a primary school. The identified BUAB ensures new development will be within reasonable walking distance, however pavements are lacking on along the A375 through much of the village. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is approaching its capacity, and forecast to exceed it by 2019/20, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.
4. To improve the population's health	0	The delineation of the BUAB ensures that people can walk to reach community facilities, although pavements are lacking on much of the A375 Sidbury does not have a doctor's surgery or pharmacy. Recreation grounds, sports pitch (cricket) and allotments provide recreation opportunities. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. The lack of health care facilities (doctor's, pharmacy, dentist) in Sidbury reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	Sidbury BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. Traffic along the A375 already causes a degree of background noise. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	Sidbury has a range of cultural, social and leisure facilities, with a primary school, shop, pub, sport pitch, and allotments. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	The core of Sidbury is covered by a Conservation Area, and there are numerous Grade II listed buildings within this area. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. Nevertheless, Sidbury BUAB and the surrounding area is entirely within the East Devon AONB, and development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	Traffic along the A375 already diminishes local amenity to a degree. A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic from new development, although the likely small-scale nature means that this effect is negligible, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Sidbury BUAB falls within 10km of the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, as stated in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB. A County Wildlife Site is some 800m to the east. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. However, the persistent lack of pavements in the village, particularly along the busy A375, could deter pedestrians. There are some services and facilities in Sidbury (including primary school, shop, pub, community hall), although it is recognised that some travel out of the village would be necessary (e.g. to the supermarket, employment, secondary school). An hourly bus service provides links to Honiton to the north, and Sidmouth/Exeter on the other direction, where is it possible to access a wider range of services. Overall, a minor positive effect against this objective.
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.	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Sidbury to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	The River Sid flows along the eastern boundary of the BUAB, and parts of the village (including the primary school) are consequently within an area of high flood risk (Flood Zone 3). In addition, some other parts of the BUAB have a risk of surface water flooding. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Sidbury that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of Sidbury BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	Sidbury BUAB is not considered likely to have an effect on this objective.

Uplyme Built-up Area Boundary

SA Objective	Preferred Option	Alternative: Exclude Land in South of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
1. To ensure everybody has the opportunity to live in a decent home.	+	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Uplyme means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	+	The village has a range of community services, including a pub, garage, community hall, primary school, and a community shop/ Post Office. The identified BUAB ensures new development will be within reasonable walking distance, although the village setting within steep valleys means that the gradient poses a challenge to walkers and cyclists. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	+ ?	The presence of a pre-school and primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is at capacity, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.
4. To improve the population's health	0	0	The delineation of the BUAB is within reasonable walking distance to reach community facilities, although Uplyme does not have a doctor's surgery or pharmacy – these can be accessed in Lyme Regis nearby. A range of recreation opportunities are present in the village, including a cricket field, football pitch, tennis court, bowling green, and children's play area. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. However, the lack of health care facilities (doctor's, pharmacy, dentist) in Uplyme reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	0	Uplyme BUAB is not considered likely to have an effect on this objective.

SA Objective	Preferred Option	Alternative: Exclude Land in South of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	Uplyme has a range of cultural, social and leisure facilities, with a primary school, shop/Post Office, pub, community hall, and sports pitches. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	0 ?	0 ?	There are relatively few designated heritage assets in Uplyme, with 17 listed buildings across the village, most notably the Grade II* listed church. A Scheduled Monument (Roman villa) is present 500m to the west, and the Dorset and East Devon Coast UNESCO World Heritage Site is around 1.3km to the south. Given this relative lack of designated heritage assets, a negligible, albeit uncertain cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ / - ?	+ / - ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. Nevertheless, Uplyme BUAB and the surrounding area is entirely within the East Devon AONB, and development proposals will need to be particularly mindful of this designation. There is an element of uncertainty, depending upon the specific location and design of new development. Mixed effects overall.

SA Objective	Preferred Option	Alternative: Exclude Land in South of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
10. To maintain the local amenity, quality and character of the local environment.	0 ?	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, although the small-scale nature means that this effect is negligible, albeit uncertain.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	The Sidmouth to West Bay SAC is a European site that follows the coastline, as stated in the HRA Screening Report, located around 1.3km to the south of the BUAB. This site is also designated as a SSSI. A County Wildlife Site is present 700m to the west of the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Uplyme (including primary school, shop, garage, pub, community hall), although it is recognised that some travel out of the village would be necessary (e.g. to the supermarket, employment, secondary school). The steep gradient that may be required for new residents to access services and facilities in the base of the valley setting of the village may present difficulties to some walkers and cyclists. There is a half hourly bus service travelling south east to Lyme Regis, and then Bridport/Dorchester/Weymouth; and the same frequency for services to Axminster in the other direction. Overall, a minor positive effect against this objective

SA Objective	Preferred Option	Alternative: Exclude Land in South of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
<p>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.</p>	+	+	<p>Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.</p>
<p>14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.</p>	0	0	<p>Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Uplyme to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.</p>

SA Objective	Preferred Option	Alternative: Exclude Land in South of Village	<p>Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)</p> <p><i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i></p>
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	0 ?	The River Lim flows through the village, and consequently causes some flood risk – however, the steeply sided valley means that areas with a high flood risk in the BUAB are limited. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale. Overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establish more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Uplyme that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Preferred Option	Alternative: Exclude Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects) <i>Given that the alternative BUAB is not significantly different from the preferred option, the sustainability effects are considered to be the same</i>
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	The identification of Uplyme BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	0	Uplyme BUAB is not considered likely to have an effect on this objective.



© Crown copyright and database rights 2017 Ordnance Survey 100023746

0.04 0.095 0.19 0.285 0.38
Kilometers

West Hill Built-up Area Boundary

SA Objective	Preferred Option	Alternative : Include Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at West Hill means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	-	There are a number of community services in West Hill, including a primary school, shop/Post Office, village hall, and petrol filling station. The identified BUAB ensures new development will be within reasonable walking distance, although many roads do not have footpaths or street lighting which may inhibit accessibility by pedestrians. A long term (assuming the facilities remain), permanent, positive effect is likely. The alternative to include land in the south of the Village is beyond desirable walking distance and lacks of appropriate pedestrian footpaths, and is therefore less accessible to community services – a negative effect.
3. To provide for education, skills and lifelong learning	+ ?	+ ?	The presence of a pre-school and primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is at capacity, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.
4. To improve the population's health	0	0	The delineation of the BUAB is within reasonable walking distance to reach community facilities, although West Hill does not have a doctor's surgery or pharmacy – Ottery St Mary, 2km to the east, contains a hospital, health centre and pharmacy. There are limited formal recreation opportunities in West Hill. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. However, the lack of health care facilities (doctor's, pharmacy, dentist) in West Hill reduces the effect to negligible.
5. To reduce crime and fear of crime.	0	0	West Hill BUAB is not considered likely to have an effect on this objective.

SA Objective	Preferred Option	Alternative : Include Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	+	West Hill has a range of cultural, social and leisure facilities, with a primary school, shop/Post Office, community hall, and the Royal British Legion. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	0	0	West Hill BUAB has a dearth of heritage assets, reflecting the fact that it was largely developed in the mid-late 20 th century. There is just a single designated asset within the BUAB, the Grade II listed church, although a Scheduled Monument is present just 100-200m to the north east (Belbury Castle). A negligible effect is considered likely.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ ?	+ ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. There are no nationally designated landscapes in or adjoining the BUAB, although the East Devon AONB is 500m to the south west at its closest point, and just over 1km to the south of the BUAB. There is an element of uncertainty, depending upon the specific location and design of new development.

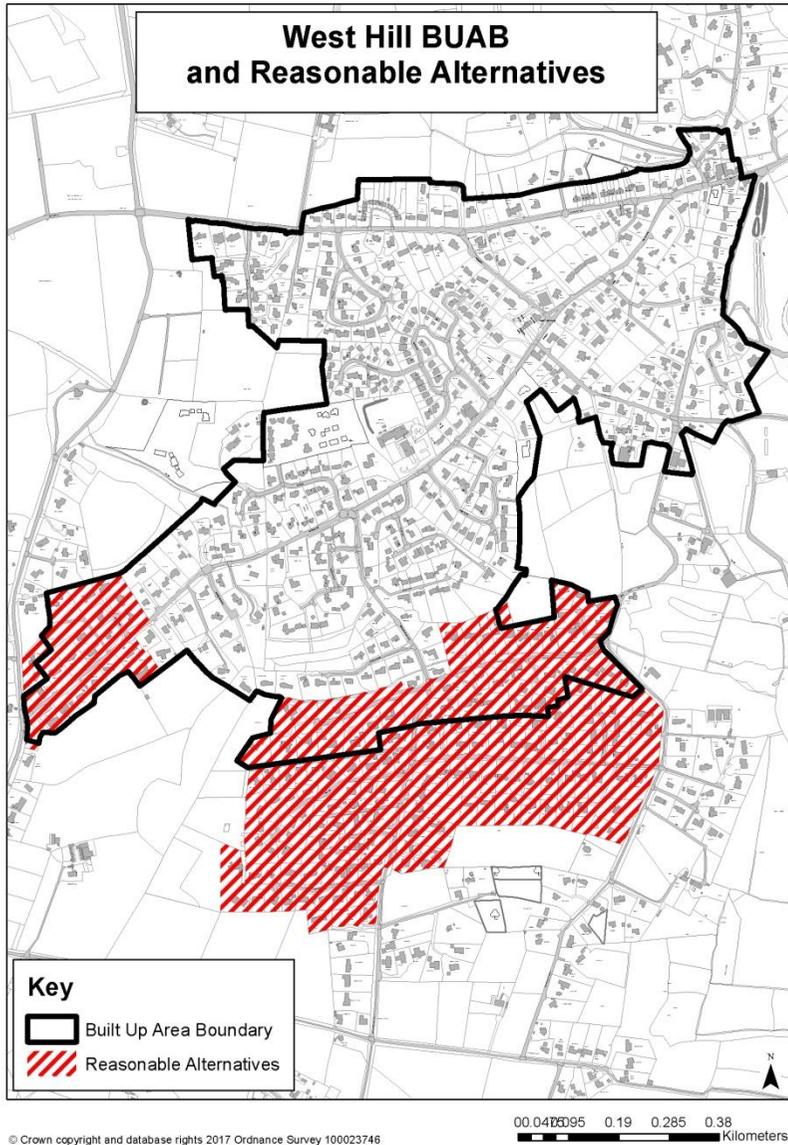
SA Objective	Preferred Option	Alternative : Include Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
10. To maintain the local amenity, quality and character of the local environment.	0 ?	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, although the small-scale nature means that this effect is negligible, albeit uncertain.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	-	<p>West Hill is within 10km of the East Devon Pebblebed Heaths SAC, as stated in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB. In fact, this European site is 700-800m away at its closest point. There are also three County Wildlife Sites within 500-600m of the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.</p> <p>The alternative to include land in the south would bring the BUAB closer to the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, to within approximately 500m, so adverse biodiversity impacts are more likely. A County Wildlife Site would also be adjacent to the south east.</p>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	-	<p>A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in West Hill (including shop, primary school, village hall), although it is recognised that some travel out of the village would occur (e.g. to the supermarket, secondary school, employment). There is an hourly bus service to Honiton in one direction, and Exeter city centre in the other. Overall, a minor positive effect against this objective.</p> <p>The alternative to include land in the south of the Village is beyond desirable walking distance and lacks of appropriate pedestrian footpaths, and will therefore not promote non-car travel – a negative effect.</p>

SA Objective	Preferred Option	Alternative : Include Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
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.	+	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond West Hill to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.

SA Objective	Preferred Option	Alternative : Include Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	0 ?	There are no areas of medium-high (FZs 2 or 3) fluvial flood risk in the BUAB, although small parts of the village are at risk of surface water flooding. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale and, overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establish more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in West Hill that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Preferred Option	Alternative : Include Land in South of Village	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	+	The identification of West Hill BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	0	West Hill BUAB is not considered likely to have an effect on this objective.



Whimble Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Whimble means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	Whimble BUAB has a basic level of community services, including a primary school, 'satellite' health centre, village hall, allotments, Post Office and a shop. The identified BUAB ensures new development will be within reasonable walking distance. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is at capacity, so some uncertainty as to whether planning obligations can mitigate any adverse impacts on school capacity.
4. To improve the population's health	+	The delineation of the BUAB ensures that community facilities are within reasonable walking distance, although parts of the village are accessed via narrow lanes with no footpath. A cricket pitch just to the north of the BUAB provides recreation opportunities, as do the allotments. A 'satellite' health centre provides access to a formal health care facility in Whimble, although the village is lacking a pharmacy or dentist. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space. Overall, a positive effect.
5. To reduce crime and fear of crime.	0	Whimble BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	Whimple has a range of cultural, social and leisure facilities, with a primary school, shop, pubs, sports pitch, and allotments. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	A Conservation Area takes in the core of the village and contains 12 listed buildings, with one further listed building elsewhere in the BUAB. The Grade II* listed church is the most notable designated heritage asset. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ ?	Limiting the extent of the BUAB to reflect the built form should promote the conservation and wise use of land, and protect the landscape character. There are several traditional orchards, particularly to the west and south of the BUAB, which are an indication of the past presence of a cider factory. There is an element of uncertainty, depending upon the specific location and design of new development, but there are no nationally designated landscapes that would be impacted by development in the BUAB.
10. To maintain the local amenity, quality and character of the local environment.	0 ?	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, although the small-scale nature means that this effect is negligible, albeit uncertain.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Whimple is within 10km of the East Devon Pebblebed Heaths SAC, as stated in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB in order to protect this European site. There are no designated biodiversity sites within 1km of the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Whimple (including shop, pub, primary school, 'satellite' health centre), although it is recognised that some travel out of the village would occur (e.g. to the supermarket, secondary school, employment) and Whimple currently fulfils something of a dormitory function. Whimple is one of only two villages that benefits from a train station, offering services to Exeter and London Waterloo. However, bus services are infrequent. Overall, a minor positive effect against this objective.
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.	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB does not include Greenfield sites so soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Whimble to access services and employment is likely by car (although the train station will reduce car travel), which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	An area of high flood risk (FZ3) runs along the western edge of the BUAB, with narrow sections extending eastwards into the village. Northern and eastern parts of Whimble are within a 'critical drainage area' meaning that new development should reduce current run-off rates. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale and, overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Whimble that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of Whimble BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	Whimble BUAB is not considered likely to have an effect on this objective.

Woodbury Built-up Area Boundary

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	+	The BUAB provides a degree of certainty that residential development will be acceptable, in principle, within the BUAB. The BUAB has been drawn to reflect planning permissions that have not yet been built. Developments of 6 dwellings and above would need to contribute to meeting affordable housing need, and the BUAB provides a more certain basis for considering exceptions housing sites. This would lead to a long term, permanent, positive effect. The relatively small numbers of dwellings likely to come forward at Woodbury means that this effect is not considered to be significant.
2. To ensure that all groups of the population have access to community services.	+	Woodbury contains a relatively good range of community services, including several shops, Post Office, village hall, pubs, doctor's surgery, primary school and sports pitches. The identified BUAB ensures new development will be within reasonable walking distance of these services. A long term (assuming the facilities remain), permanent, positive effect is likely.
3. To provide for education, skills and lifelong learning	+ ?	The presence of a primary school provides for education needs of younger children, although secondary-aged children and those wishing to attend college would need to travel elsewhere. The primary school is approaching capacity, so some uncertainty with regards to impacts upon school capacity.
4. To improve the population's health	+	89% of Woodbury residents describe their health as 'good' or 'very good', the highest of any of the villages. A doctor's surgery located near to the village centre provides easy access to this health care facility, although the village is lacking a pharmacy or dentist. A cricket pitch, football pitch, and tennis courts provide recreation opportunities in Woodbury. The BUAB also ensures that new development should be within reasonable walking distance to these facilities – such activity can help to improve the population's health. NPPF and Local Plan policies should ensure that new development is well-designed, providing appropriate levels of open space.
5. To reduce crime and fear of crime.	0	Woodbury BUAB is not considered likely to have an effect on this objective.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	- ?	New development can increase noise levels, particularly during construction and also from an increase in vehicular traffic. A cumulative effect on noise levels is possible where several developments are delivered. A minor negative effect is identified, with some uncertainty depending on precise location.
7. To maintain and improve cultural, social and leisure provision.	+	Woodbury has a range of cultural, social and leisure facilities, with a primary school, shop/Post Office, pubs, sports pitches, and doctor's surgery. Given this, a minor positive effect is considered likely.
8. To maintain and enhance the historic environment, heritage assets and their settings.	- ?	A Conservation Area covers the core of the village and includes around 43 listed buildings, most notably the Grade I listed church. Existing policies in the NPPF and Local Plan should provide sufficient mitigation to ensure that heritage assets are conserved and enhanced. A minor negative, albeit uncertain, cumulative effect is likely, depending upon the specific location and design of new development.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+ ?	Limiting the extent of the BUAB to reflect the built form (along with permitted sites) should promote the conservation and wise use of land, and protect the landscape character. There is an element of uncertainty, depending upon the specific location and design of new development, but there are no nationally designated landscapes that would be impacted by development in the BUAB.
10. To maintain the local amenity, quality and character of the local environment.	-	A minor negative impact on local amenity is possible due to increased noise during construction and/or increased vehicular traffic, particularly given the two large sites included in the BUAB that are still to be delivered. The B3179 which runs through the south of the village already detracts from local amenity.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	-	Woodbury is within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA (this site being 1.5km to the east of the BUAB), as stated in the HRA Screening Report, and therefore mitigation will be required from new development in the BUAB. Nevertheless, there are no designated sites closer than 1.5km to the BUAB. The NPPF and Local Plan policies will provide mitigation, and development proposals are likely to be small-scale. A residual negative, cumulative effect is considered likely.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	A key issue in defining the BUAB was the ability to walk (considering both distance and quality) to key services and facilities. There are some services and facilities in Woodbury (including shop/Post Office, pub, primary school, health centre, sports pitches), although it is recognised that some travel out of the village would occur (e.g. to the supermarket, secondary school, employment). An hourly bus service to Exeter is available on the B3179, with a bus to Exmouth from the northern edge of the BUAB (also hourly). Overall, a minor positive effect against this objective.
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.	+	Air quality may be adversely affected if new development increases vehicle movements, although this would be very minor due to the likely small-scale of any development. The BUAB includes two Greenfield sites (of approximately 30 dwellings and 10 dwellings) that already have planning permission. Soil quality should be maintained, and water quality is unlikely to be significantly affected. A positive effect overall.

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	Additional built development may increase greenhouse gas emissions, although this is likely to be small-scale. Some travel beyond Woodbury to access services and employment is likely by car, which would also increase greenhouse gas emissions. New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. These effects counter balance each other to a degree, resulting in an overall negligible effect.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0 ?	Two narrow sections of high flood risk run through the village, joining at Woodbury Mills where the area becomes larger. Similar parts of the village are at risk of surface water flooding. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated, and new development may offer opportunities for the use of SuDS. New development is likely to be small-scale and, overall, a negligible effect is considered likely with some uncertainty depending upon specific location and design of new development.
16. To ensure energy consumption is as efficient as possible.	0	Although new development may lead to higher energy consumption, modern buildings are more energy efficient and offer opportunities for incorporating renewable energy production. Overall, any impacts are likely to be negligible.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	+ ?	It can be assumed that additional development in the BUAB will result in increased waste production, although new development may provide opportunities to establishing more sustainable waste management practices. There is some uncertainty on this. The re-use of existing buildings and development of brownfield sites in the BUAB would have a positive effect.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Score	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	Jobs would be created during construction, offering a short term benefit, but there are limited services and facilities in Woodbury that could offer employment opportunities for new residents. Out-commuting from new residents is therefore likely, although this should not grow significantly given the limited scale of development that is likely within the BUAB. Negligible effect overall.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	+	The identification of Woodbury BUAB provides the opportunity for new development to support services and facilities in the village.
20. To encourage and accommodate both indigenous and inward investment.	0	Woodbury BUAB is not considered likely to have an effect on this objective.

Appraisal Matrix of Village/Town Centre vitality Policies

Sustainability Appraisal of Policy VP02 Beer – Village Centre vitality; and Policy VP03 Colyton – Town Centre vitality

SA Objective	Policy VP02 – Beer vitality	Policy VP03 – Colyton vitality	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	0	0	The policy restricts changes of use to residential as this is not a defined 'main town centre use'. However, the limited scale of potential changes to residential use means that the policy would have negligible effects on this objective.
2. To ensure that all groups of the population have access to community services.	++	++	Resisting the loss of main town centre uses, which would include some community services, will benefit access to these services. The establishment of new main town centre uses outside the defined vitality area is resisted, further achieving this objective. Overall, a long-term, permanent, significant positive effect.
3. To provide for education, skills and lifelong learning	0	0	Although the community uses could be said to provide education and skills, and impact is likely to be negligible.
4. To improve the population's health	+	+	The uses that the policy seeks to protect would include health and fitness centres. The retention of shops will continue to provide the opportunity to access these on foot/bicycle, and the establishment of new main town centre uses outside the defined vitality area is resisted, so a positive effect overall.
5. To reduce crime and fear of crime.	0	0	The policy is not considered likely to have an effect on this objective.

SA Objective	Policy VP02 – Beer vitality	Policy VP03 – Colyton vitality	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	0	0	Although noise levels from alternative uses such as residential may be less than main town centre uses, any impacts are likely to be negligible.
7. To maintain and improve cultural, social and leisure provision.	++	++	This policy positively seeks to maintain main town centre uses, which would include cultural, social and leisure provision. Proposals for new main town centre uses outside the defined vitality area are resisted. Therefore a long-term, permanent, significant positive effect.
8. To maintain and enhance the historic environment, heritage assets and their settings.	+	+	Resisting the scope for changes of use provide greater potential to maintain and enhance the historic environment in central Beer, which includes a Conservation Area and several listed buildings. The same would apply to central Colyton, which includes a Conservation Area and several listed buildings.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	0	0	The policy is not considered likely to have an effect on this objective.

SA Objective	Policy VP02 – Beer vitality	Policy VP03 – Colyton vitality	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
10. To maintain the local amenity, quality and character of the local environment.	+	+	Resisting the scope for changes of use means a long-term, permanent positive effect relating to maintaining local amenity.
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	0	0	The policy is not considered likely to have an effect on this objective.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	+	+	Resisting the loss of main town centre uses means that the policy is likely to have a positive effect on this objective, as it will ensure facilities remain accessible to non-car based modes.

SA Objective	Policy VP02 – Beer vitality	Policy VP03 – Colyton vitality	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
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.	0	0	The policy is not considered likely to have an effect on this objective.
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	Retaining community services should minimise greenhouse gas emissions from travel, but overall any effects are likely to be negligible.
15. To ensure that there is no increase in the risk of flooding as a result of development.	0	0	The policy is not considered likely to have an effect on this objective.

SA Objective	Policy VP02 – Beer vitality	Policy VP03 – Colyton vitality	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
16. To ensure energy consumption is as efficient as possible.	0	0	The policy is not considered likely to have an effect on this objective.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	0	0	The policy is not considered likely to have an effect on this objective.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	+	+	Resisting the loss of main town centre uses will ensure jobs remain in the village/town centre.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	++	++	The retention of main town centre uses, and resistance to such uses outside the centre will have significant positive effect on the village/town centre vitality and viability.

SA Objective	Policy VP02 – Beer vitality	Policy VP03 – Colyton vitality	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
20. To encourage and accommodate both indigenous and inward investment.	+	+	Retaining main town centre uses will support investment in the village/town.

Appraisal matrix of Policy VP04 – Greendale Business Park and Policy VP05 – Hill Barton Business Park

SA Objective	Policy VP04 – Greendale Business Park	Policy VP05 – Hill Barton Business Park	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
1. To ensure everybody has the opportunity to live in a decent home.	0	0	The policies are not considered likely to have an effect on this objective.
2. To ensure that all groups of the population have access to community services.	0	0	The policies are not considered likely to have an effect on this objective.
3. To provide for education, skills and lifelong learning	0	0	Limiting growth at the business parks may not provide for skills through apprenticeship opportunities, but a negligible effect is likely.
4. To improve the population's health	0	0	The policies are not considered likely to have an effect on this objective.
5. To reduce crime and fear of crime.	0	0	The policies are not considered likely to have an effect on this objective.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	0	0	Although the business parks currently generate noise, the policies are not considered likely to have an effect on this objective as they continue the current restrictive approach in the Local Plan, which mean that further 'noisy' development is unlikely.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Policy VP04 – Greendale Business Park	Policy VP05 – Hill Barton Business Park	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
7. To maintain and improve cultural, social and leisure provision.	0	0	The policies are not considered likely to have an effect on this objective.
8. To maintain and enhance the historic environment, heritage assets and their settings.	0	0	Both business parks contain a single Grade II listed building, with one or two others located just beyond. The limited range of designated heritage assets, mitigation of adverse impacts through applying NPPF and Local Plan policies, and the restrictive nature of policies VP04/05, means that effects are likely to be negligible.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	+	+	Whilst the Business Parks fall outside of the Areas of Outstanding Natural Beauty (AONBs) they are nonetheless in attractive countryside locations. Hill Barton lies on flatter land and closer to the A3052. Greendale, with much of the existing business park sitting in a valley floor, is in a more undulating setting and is closer to the East Devon ANOB which is under 2 kilometres away (under 1.2 miles). Resisting further development at the business parks through continuing the restrictive Local Plan policy approach would mean a positive effect on this objective.
10. To maintain the local amenity, quality and character of the local environment.	+	+	Resisting further development at the business parks through continuing the restrictive Local Plan policy approach would mean a positive effect on this objective.

SA Objective	Policy VP04 – Greendale Business Park	Policy VP05 – Hill Barton Business Park	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
11. To conserve and enhance the biodiversity and geodiversity of East Devon, including the protection of European sites and SSSI's.	+	+	<p>The business parks are within 10km of the Exe Estuary SPA and the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA, with a County Wildlife Site located around 700m south east of Greendale.</p> <p>Resisting further development at the business parks through continuing the restrictive Local Plan policy approach would mean a positive effect on this objective.</p>
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	0	0	<p>The isolated, countryside location of the business parks, adjacent to the A3052, means that travel by car/van/lorry is the most attractive transport mode. For anyone wishing to travel from Exeter or Sidmouth to Greendale or Hill Barton there are frequent bus services, around three per hour in either direction through most of the day. However, using the bus stops will mean crossing the busy A3052 (with limited pedestrian crossing points) when leaving/arriving at the business parks. At Greendale, the length of walk (1.3km), poor quality walking route, and gradient is further likely to discourage bus users.</p> <p>Overall, the policies will likely mean a continuation of existing travel patterns due to further growth at the business parks being restricted, which would mean a neutral/negligible effect compared to the current situation.</p>
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.	+	+	<p>Both sites are located in areas of Grade 3 agricultural land, with a section of Grade 1 and Grade 2 west and north of Greendale. Resisting further development would at least maintain air, soil and water quality, so positive effect.</p>

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Policy VP04 – Greendale Business Park	Policy VP05 – Hill Barton Business Park	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
14. To contribute towards a reduction in local emissions of greenhouse gases and increase the capacity of villages to adapt to climate change.	0	0	New development should incorporate appropriate mitigation to ensure it can adapt to the effects of climate change through the implementation of the NPPF and Local Plan policies. Although the policies would restrict further development, a reduction in local emissions is not likely, so a negligible effect overall.
15. To ensure that there is no increase in the risk of flooding as a result of development.	+	+	Small areas of surface water flood risk exist on both business parks, whilst Greendale has a section of Flood Zone 3 that dissects the site. The NPPF and Local Plan policies should ensure adverse impacts are avoided/mitigated. A positive effect as further development is restricted through applying policies VP04/05.
16. To ensure energy consumption is as efficient as possible.	0	0	Any impacts are likely to be negligible, as further development is restricted through applying policies VP04/05. Local Plan policies would provide mitigation.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	0 ?	0 ?	Local Plan policies would provide mitigation. There is some uncertainty but, overall, any impacts are likely to be negligible, as further development is restricted through applying policies VP04/05.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

SA Objective	Policy VP04 – Greendale Business Park	Policy VP05 – Hill Barton Business Park	Commentary/Explanation (to include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects)
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	0	0	The sustainable growth of employment in East Devon is advocated through sites at the Towns and in the West End in the Local Plan, rather than at Greendale and Hill Barton Business Parks. A negligible effect is likely as this Local Plan policy approach will continue.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	0	0	The isolated location of the business parks means that the vitality and viability of Towns are not likely to be significantly affected. Local Plan policies would provide mitigation and, overall, any impacts are likely to be negligible, as further development is restricted through applying policies VP04/05.
20. To encourage and accommodate both indigenous and inward investment.	-	-	A minor negative effect is likely for this more generic economic objective (compared to objective 18) through applying policy VP04/05, as they advocate a continuation of restrictive Local Plan policies at the business parks.

Appendix 5 – Built-up Area Boundary criteria

The following criteria have been used by East Devon District Council Planning Officers to help determine where Built-up Area Boundaries are drawn for a draft consultation of the Villages Plan in July 2016. The criteria were subject to public consultation in the summer of 2016 and some amendments have been made to take account of representations received. Revisions are shown as new text in red and underlined and deleted text ~~crossed-out~~. A [plain English guide](#) to help interpret the criteria is also available.

	Ref	Criteria	Exceptions	Commentary
General Criteria	A1	Boundaries should reflect the existing scale and core built form of the settlement and should not seek expansion to facilitate additional development.	Communities may wish to allocate specific sites to accommodate additional development through neighbourhood planning. If a neighbourhood plan is made that allocates development, that site may be included within the Built-up Area Boundary under criteria B3, although this may be at a future review of the Villages Plan, depending on the timing.	It is important that the Villages Plan is prepared in accordance with the strategy set out in the new <u>adopted</u> local plan, which does not make provision for increased levels of development in rural settlements (rather it provides for infill development within the boundary and potential for affordable housing at the edges justified as an exception).
	A2	Where practical, boundaries should follow clearly defined physical features such as walls, fences, hedgerows, roads and water courses.	Where buildings are set in large grounds physical features may not form the appropriate boundary, depending on the relationship with the fabric of the settlement. For example, large gardens that 'stretch out' from the main built up area may be specifically excluded despite the absence of a physical boundary feature.	It is clearly desirable for lines on maps to follow physical features that have a degree of permanence. This enables the plan to be easily read and understood by interested parties and often such features on the edge of settlements mark a change in character from built settlement to rural. However, sometimes the change in character is more gradual, for example where large gardens form a 'buffer' between the main built form of the settlement and the wider countryside. In these circumstances it may be appropriate for the BUAB not to follow physical features.
Areas to be included	B1	Built and extant planning permissions for residential and employment uses which are both	Where planning permission has been granted as an exception to normal planning policy, including any market housing built to enable affordable housing under either the interim 'mixed market	Where sites with permission will secure development that will fall in line with the criteria detailed in this methodology it will typically be appropriate to include them in the boundary.

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

	Ref	Criteria	Exceptions	Commentary
		physically and functionally related to the settlement.	affordable housing' policy or Strategy 35 of the emerging East Devon Local Plan <u>OR where planning permission has been granted but due to special circumstances, such as low density development to protect mature trees, exclusion is appropriate.</u>	
	B2	Built and extant planning permissions for community facilities, such as religious buildings, schools and community halls which are considered to be <u>physically</u> and functionally related to the settlement.	Where the buildings are set in extensive grounds either the grounds or the buildings and grounds may be excluded, depending upon the physical and functional relationship with the settlement.	Where buildings are physically well related to the built form of a settlement inclusion is appropriate. However, to include spacious grounds that are clearly beyond the built form of a settlement would suggest that development would be permitted in them when this is not the intention.
	B3	Site allocations identified in the development plan for residential, community or employment uses which are physically and functionally related to the settlement.	Significant areas of open space on the edge of site allocations with the countryside will not be included	If site allocations are contained in a neighbourhood plan that is Made, the Built-up Area Boundary defined in the Villages Plan will be amended when the plan is reviewed. In the interim there may be a discrepancy between the neighbourhood and villages plan.
Areas to be excluded	C1	The curtilage of any property with the capacity to extend the built form of the settlement, including large residential gardens.	Where there are small areas of land surrounded on more than two sides or predominantly surrounded by buildings that would not extend the visual appearance of the settlement, subject to detailed landscape assessment.	The definition of Built-up Area Boundaries, is about defining a group of land and buildings that together take the physical form of a settlement. It is not about including outlying land and buildings simply because they share an address or post code or including land with future development potential.
	C2	Recreational or amenity space at the edge of settlements which has a predominantly open visual character.	Built structures, such as clubhouses, may be included where they 'read' as being part of the built form of the village.	
	C3	Isolated development which is physically or visually detached from the settlement (including farm	There is no expectation of there being exceptions.	

East Devon Villages Plan DPD - Sustainability Appraisal Report, December 2017

	Ref	Criteria	Exceptions	Commentary
		buildings or renewable energy installations).		
	C4	Parts of settlements that might comprise of groups of houses or buildings but which are separated by fields or open space from the main core of the village.	The only exception would apply where an outlying area also contains a range of services and facilities which might form a core service area in its own right.	