

East Devon Local Plan 2020-2040



Sustainability Appraisal (incorporating Strategic Environmental Assessment)

Scoping Report November 2021



East Devon – an outstanding place

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1 Introduction

Overview of the Local Plan and the role of Sustainability Appraisal

- 1.1 A review of the East Devon Local Plan 2013-2031 (adopted in January 2016) concluded that an update of this Plan was required.¹ Therefore, East Devon District Council is working on a revised Local Plan, envisaged to cover the period from 1 April 2020 to 31 March 2040. The Local Plan will show how East Devon will develop in the future and provide policies which will guide decisions on whether or not planning applications are granted. It will address development needs for housing, employment, and related development, and support high quality new development in appropriate locations; whilst also conserving and enhancing the natural and historic environment.
- 1.2 Sustainability appraisal (SA) is a systematic process that must be carried out alongside preparation of the Local Plan. The role of SA is to promote sustainable development by assessing how the Local Plan, when judged against reasonable alternatives, will help to achieve environmental, economic and social objectives.
- 1.3 SA of local plans is a legal requirement, under Section 19 of the Planning and Compulsory Purchase Act 2004.² SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004,³ commonly referred to as the 'Strategic Environmental Assessment (SEA) Regulations'. This ensures that potential environment effects are considered alongside social and economic issues when preparing the Local Plan. Government guidance provides clarity on the need for SA and SEA in relation to plan preparation;⁴ as does practice advice.⁵
- 1.4 It is important to note that SA should focus on what is needed to assess the likely significant effects of the Plan, not all effects. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate the content and level of detail in the Local Plan.⁶

¹ East Devon Local Plan 2013-31 review assessment: [e-devon-lp-review_pas-toolkit-part-1-local-plan-review.pdf](https://www.eastdevon.gov.uk/e-devon-lp-review_pas-toolkit-part-1-local-plan-review.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk)) ; and Form & content checklist: [e-devon-lp-review_pas-toolkit-part-2-local-plan-contentdocx.pdf](https://www.eastdevon.gov.uk/e-devon-lp-review_pas-toolkit-part-2-local-plan-contentdocx.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk))

² Planning and Compulsory Purchase Act 2004, Section 19: [Planning and Compulsory Purchase Act 2004](https://www.legislation.gov.uk/ukpga/2004/24/part_19) ([legislation.gov.uk](https://www.legislation.gov.uk))

³ The Environmental Assessment of Plans and Programmes Regulations 2004: [The Environmental Assessment of Plans and Programmes Regulations 2004](https://www.legislation.gov.uk/ukreg/2004/161) ([legislation.gov.uk](https://www.legislation.gov.uk))

⁴ Planning practice guidance, SA and SEA: [Strategic environmental assessment and sustainability appraisal](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal) - GOV.UK (www.gov.uk)

⁵ SEA – Improving the effectiveness and efficiency of SEA/SA for land use plans, RTPI, 2018: [RTPI | Strategic Environmental Assessment: SEA/SA for Land Use Plans](https://www.rtpi.org.uk/strategic-environmental-assessment-sea-sa-for-land-use-plans)

⁶ Planning practice guidance, Reference ID: 11-009-30140306: [Strategic environmental assessment and sustainability appraisal](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal) - GOV.UK (www.gov.uk)

- 1.5 The Local Plan covers the operational geographical extent of East Devon District Council, as shown on the following map. The Local Plan is envisaged to cover all relevant planning policy matters that fall within the remit of the District Council.

Sustainability Appraisal and Local Plan preparation stages

- 1.6 The scoping report is the first stage of the SA process, identifying the scope and level of detail of the information to be included in the SA report. Scoping sets the context, objectives and approach of the SA; identifying relevant environmental, economic and social issues and objectives. This helps to ensure that the SA process is proportionate and relevant to the plan being assessed.
- 1.7 The diagram that follows the maps of East Devon (figure 1.1) sets out how the SA process should be applied to Local Plan preparation by showing their key preparation stages. This report, the 'Scoping Report', is concerned with meeting the requirements of "Stage A". The subsequent chapters in this report satisfy tasks 1 – 5 in Stage A.

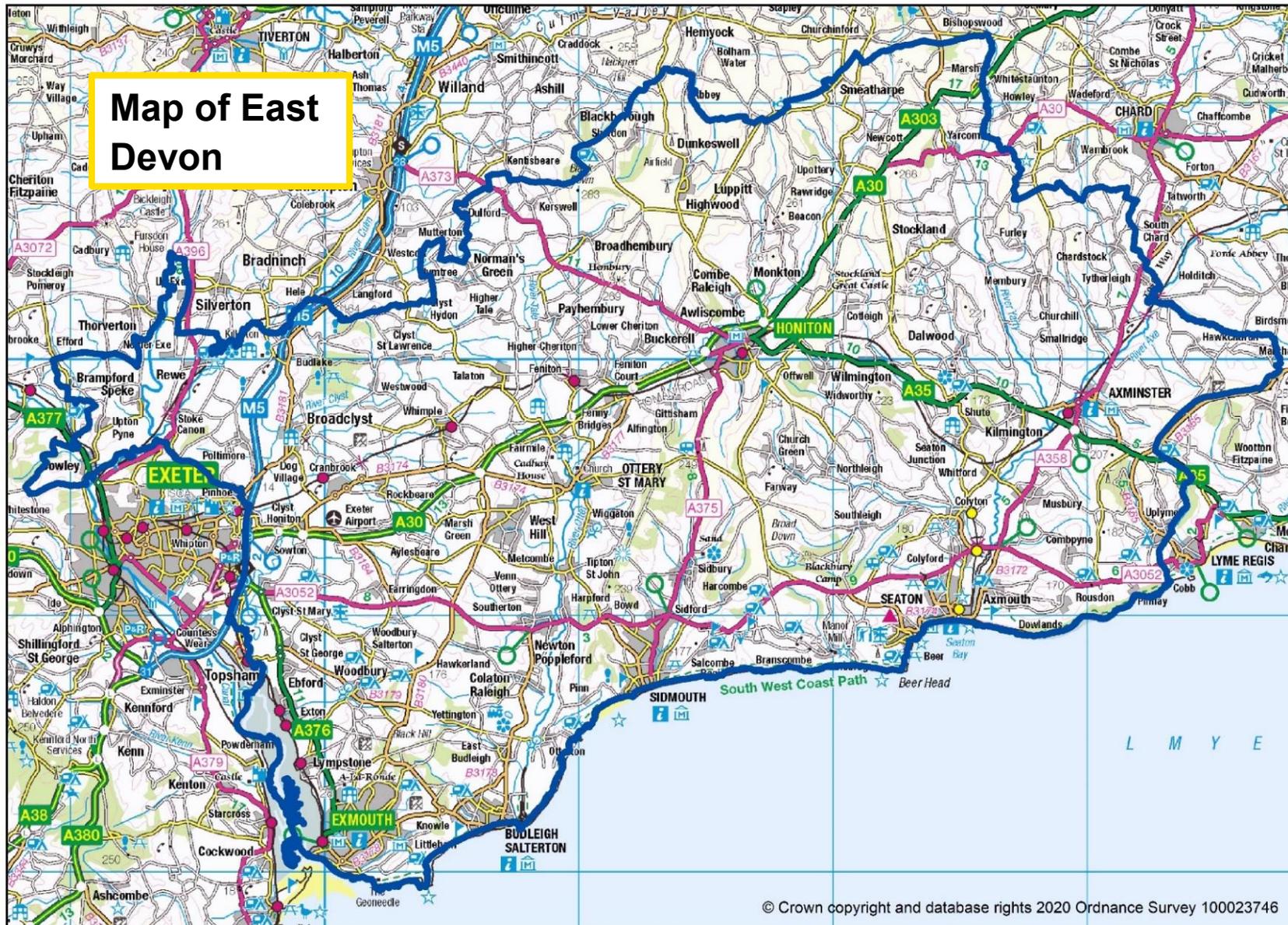
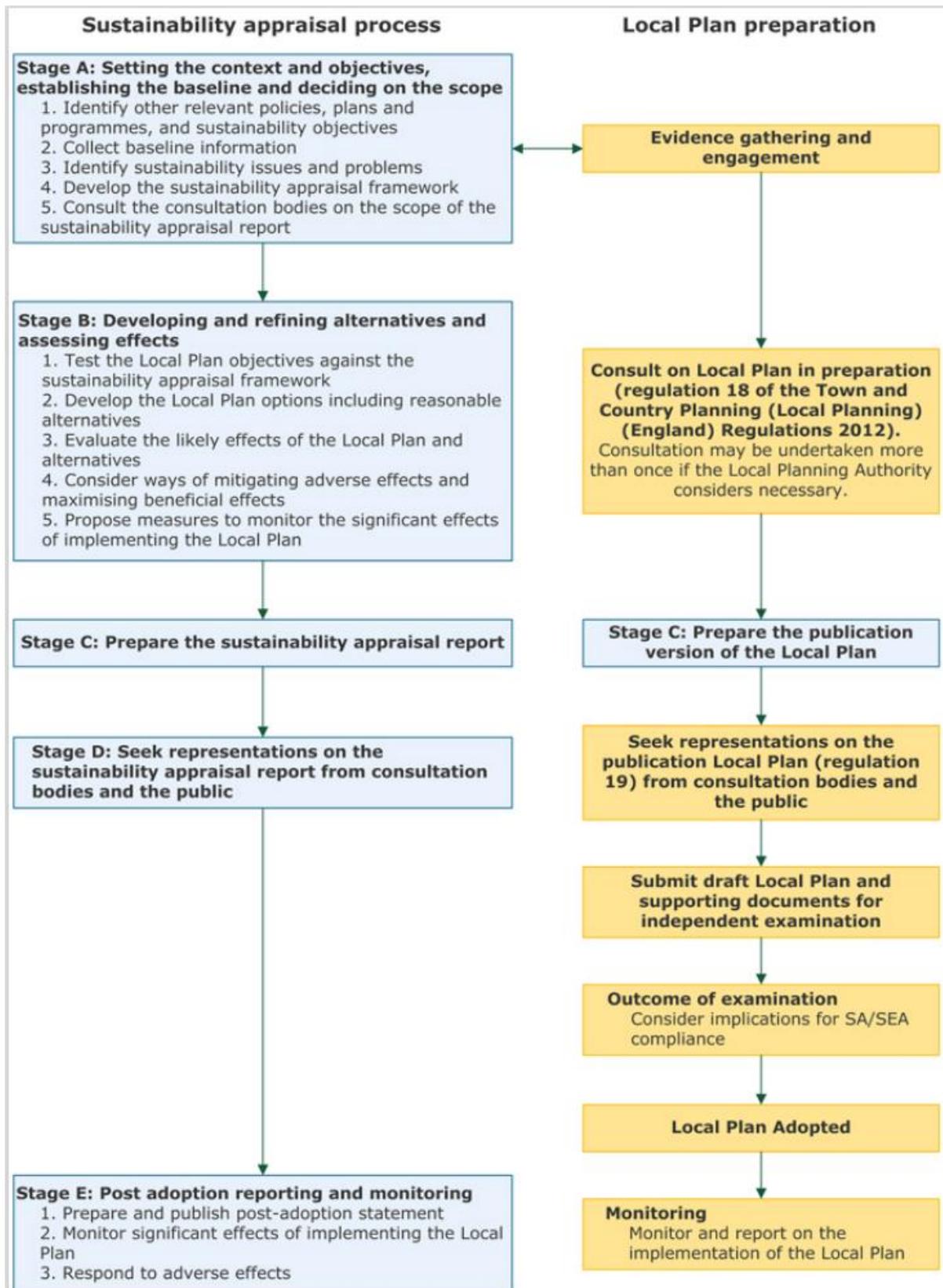


Figure 1.1: Sustainability Appraisal process and Local Plan preparation (from Planning practice guidance, Reference ID: 11-013-20140306)



2 Policy context

- 2.1 To help establish the scope for the SA, it is important to understand the policy context within which the Local Plan is being prepared (stage A1). Therefore, this chapter (alongside Appendix A) identifies other relevant policies, plans and programmes, and sustainability objectives; and then provides a summary of their implications for the Local Plan and SA. This chapter is ordered by geographic area, and also includes surrounding development plans.
- 2.2 A proportionate approach has been taken that focusses on key policy documents, consistent with Government guidance and practice advice.⁷ For example, information relating to waste and minerals planning will not be included within the scope of the Local Plan (other than in the context of how such issues could impact on other plan policy), as these matters are addressed through plans prepared by Devon County Council.
- 2.3 In the past, a wide range of laws originated from the EU relating to environmental issues. Following the UK's departure from the EU, from 1 January 2021 directly applicable EU law no longer applies to the UK and the UK is free to repeal law that has been transposed into UK law. For completeness, relevant EU legislation has still been referred to where UK legislation is yet to be amended.

International

- 2.4 EU Directive 2001/42/EC (the 'SEA Directive') provides a high level of environmental protection by setting out detailed requirements for the environmental assessment of plans – indeed, this Directive, as translated into UK law, is the reason why SEA (and SA) is required for local plans. Another key EU Directive is 92/43/EEC on the conservation of wild fauna and flora (the 'Habitats Directive'), which requires a Habitats Regulations Assessment (HRA) of the Local Plan to ensure potential negative environmental effects on European protected sites are identified and can be mitigated.
- 2.5 A wide range of other EU Directives on issues including water quality, waste, and air quality. Most of these have been transposed into UK law, but have been included in Appendix One for completeness.

National

- 2.6 There are numerous national level plans, policies and programmes that contain relevant objectives for the Local Plan and SA. The National Planning Policy Framework (NPPF) is particularly important,⁸ setting out the Government's planning policies for England and how these should be applied. The NPPF states the purpose of the planning system is to contribute to the achievement of sustainable development, setting out three overarching objectives: economic, social, and environmental (NPPF, paragraph 8). Further detail on delivering these objectives is contained throughout the NPPF, including the presumption in favour of sustainable development (paragraph 11) which means that "*all plans*

⁷ Planning practice guidance, Reference ID: 11-009-20140306: [Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal) ; SEA – Improving the effectiveness and efficiency of SEA/SA for land use plans, RTPI, 2018: [RTPI | Strategic Environmental Assessment: SEA/SA for Land Use Plans](https://www.rtpi.org.uk/publications/strategic-environmental-assessment-sea-sa-for-land-use-plans)

⁸ National Planning Policy Framework, MHCLG, 2021: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/90261/nppf-2019.pdf)

should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. Strategic policies should provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...” unless other NPPF policies provide a strong reason for restricting development. Planning practice guidance provides detail on implementing the NPPF, based around a wide range of topics.

- 2.7 The Climate Change Act 2008 was the first legislation in the world to provide a comprehensive framework to tackle global warming, and was amended in 2019 to commit the UK to net zero emissions by 2050.
- 2.8 The Environment Act 2021 provides long-term protection and recovery for the UKs natural environment, part of the delivery of the Government’s 25-year Environment Plan. The Act introduces a 10% biodiversity net gain as a statutory requirement for new development, alongside requirements for Government to introduce long-term targets for air quality, water, biodiversity, resource efficiency and waste reduction. Section 41 of the Natural Environment and Rural Communities Act 2006 and the UK Biodiversity Action Plan identify priority habitats and species.
- 2.9 Statutory protection for the historic environment is achieved through the Planning (Listed Buildings and Conservation Areas) Act 1990. Historic England has published a good practice guide on implementing historic environment policy (The Historic Environment in Local Plans). In light of this, the Local Plan should include policies to conserve and enhance the historic environment, and the SA process should reflect this aim. National Character Areas have been prepared by Natural England, which divide England into distinct natural areas, following natural lines in the landscape rather than administrative boundaries. These are based upon a combination of landscape, biodiversity, geodiversity, history, and cultural and economic activity.
- 2.10 ‘Build Back Better: our plan for growth’ (2021) sets out the Government’s plans to support economic growth through significant investment in the three core pillars of growth: infrastructure, skills, innovation. It intends for growth to level up the whole of the UK, support the transition to net zero, and support a vision for Global Britain.
- 2.11 The creation of high quality, beautiful and sustainable buildings and places is fundamental to what planning should achieve (NPPF, paragraph 130) – several guidance documents provide further detail on achieving this, including the National Design Guide and National Model Design Code, Building for a Healthy Life, and Lifetime Neighbourhoods.

Local

- 2.12 A range of local plans, policies and programmes provide further detail on sustainability issues in East Devon, often informed by those produced at an international and national level.
- 2.13 The East Devon District Council Plan 2021-23 has a vision to make a positive difference to residents’ lives and the environment, to be achieved through three priorities: better homes and communities for all, a greener East Devon, and a resilient economy. Like many local authorities, East Devon District Council declared a “climate emergency” in 2019 and has produced a Climate Change Strategy 2020 –

2025 with a vision to become a carbon neutral council by 2040, working within a low carbon economy and lifestyle, reflected in travel, homes, businesses, visitors and communities.

- 2.14 South West Water's Water Resource Management Plan concludes that there is sufficient water supply up to the year 2045. It states that groundwater provides most of the water supply for East Devon. Water quality is considered in the South West River Basin Management Plan, which identifies the priority river basin management issues for the East Devon catchment as agricultural diffuse pollution, protected areas, and invasive and non-native species. The Devon Local Flood Risk Management Strategy 2021-2027 contains a series of principles to balance the needs of communities, the economy and the environment through partnership working, with sustainable flood risk management. Priority communities in East Devon that will be considered for flood risk investigation and potential investment are Exmouth, Seaton, Budleigh Salterton, and Sidmouth, all due to surface water flooding. The River Axe Nutrient Management Plan includes measures to ensure that housing development in this river catchment does not increase phosphates, in order to protect its ecology.
- 2.15 The Devon Biodiversity Action Plan (2009) identifies the key wildlife and geological features and sets priorities for nature conservation. The East Devon and Blackdown Hills Landscape Character Assessment (2019) details the rich diversity of landscapes in the area, identifying 17 landscape character types across East Devon. The East Devon AONB Management Plan 2019-24 (renamed as the 'Partnership Plan') contains strategic aims to conserve and enhance the natural beauty of the AONB; and support sustainable social and economic development that is compatible with the landscape. Similarly, the Blackdown Hills AONB Management Plan 2019-2024 identifies the special qualities of this AONB, stating that planning policies should give it great weight, new buildings designed to the highest standards, and affordable housing need is met in accessible locations. The Clyst Valley Regional Park 25 Year Masterplan includes a range of sustainability objectives to ensure continued protection of this large area of land in the western part of East Devon.
- 2.16 In the future, as a requirement of The Environment Act 2021, Local Nature Recovery Strategies will establish priorities and map proposals for specific action actions to drive nature's recovery and provide wider environmental benefits.
- 2.17 Historic England produce a snapshot of historic sites known to be at risk from neglect, decay or inappropriate development in its annual Heritage at Risk Register. The latest register (2021) identifies 29 heritage assets as being 'at risk' in East Devon – the only asset where inappropriate development is identified as being an issue, and thus relevant to Local Plan production, is at Bicton Registered Park and Garden. East Devon District Council has produced a Heritage Strategy that contains detailed information on heritage assets in the district, and objectives that have implications for the Local Plan include to positively manage heritage assets, and to encourage development which enhances distinctiveness.
- 2.18 The Devon Minerals Plan makes clear the importance of maintaining an adequate supply of minerals, whilst limiting the impacts of their working. The Budleigh Salterton Pebble Beds are identified an important area for extracting sand and gravel, as are several small-scale building stone quarries. The Devon Waste Plan identifies how sustainable waste management will be achieved, with energy recovery sites identified at Greendale and Hill Barton, business parks that are adjacent to the A3052 in the western part of the district.

- 2.19 The importance of infrastructure delivery to underpin economic growth is made clear in the Heart of the South West Local Enterprise Partnership (LEP) Strategic Economic Plan. Similarly, the LEP Local Industrial Strategy contains objectives to improve transport networks, improve digital connectivity, accelerate housing delivery, and ensure there is sufficient employment land.
- 2.20 Transport infrastructure in particular has been subject to several local plans, policies and programmes. The Local Transport Plan 2011-2026 objectives include supporting new development, providing sustainable travel, including the specific scheme for the Dinan Way extension in Exmouth. Further transport schemes are included in the Transport Infrastructure Plan, some of which have been delivered – outstanding projects include the Axminster relief road, Clyst St Mary roundabout, and the Clyst Valley Way. Walking and cycling improvements are proposed in the Cycling and Multi-Use Trail Strategy, with schemes including cycle links from Cranbrook to Exeter, Seaton to Colyton, and Feniton to Sidmouth. Strategic improvements to the railway network in East Devon are proposed through railway passing loops at Axminster, Honiton, and Whimble to Cranbrook (Continuous Modular Strategic Planning – West of England Line Study, 2020). Devon’s Bus Services Improvement Plan aims/objectives include to grow bus patronage, create a bus network that meets the needs of users, and increase bus priority to make it an attractive alternative to the car. Propose strategic bus links in East Devon are new services to the east of Exeter (including the Enterprise Zone), more direct Seaton to Exeter journeys, improved frequency from Honiton to Taunton, a new link between Honiton and Cullompton, along with better bus connections to rail services.

Surrounding development plans

- 2.21 When preparing the Local Plan, East Devon District Council is under a legal ‘duty to co-operate’ with Devon County Council and other prescribed bodies on strategic matters that cross administrative boundaries – this will be addressed through statements of common ground. Many cross-boundary issues are already highlighted in the plans, policies and programmes prepared by Devon County Council and other prescribed bodies previously discussed in this chapter and in Appendix One. The following cross-boundary issues arise from adopted and emerging development plans that surround East Devon, along with consultation responses to the East Devon Local Plan Issues and Options:
- Housing – both the West Dorset, Weymouth & Portland Local Plan (adopted 2015) and emerging Dorset Plan (consultation 2021) favour proposals that support the long-term growth of Lyme Regis and Uplyme if necessary, given the two settlements are adjacent to each other.
 - Housing – Torbay submitted a consultation response that sought help in meeting their housing need by new homes being located in East Devon.
 - Transport – impacts of development in East Devon upon the road network in Exeter.
 - Water quality – phosphate issues in the River Axe, potentially arising from development in South Somerset, Dorset, and East Devon.
 - Flood risk – river catchment boundaries do not align with East Devon’s district boundary, so need to consider flood risk management across administrative boundaries. Influencing

development and land management in upstream areas of East Devon's rivers can help to reduce adverse impacts on water quality (discussed above) and flooding.

- Climate change – opportunities to mitigate and adapt to climate change cross local authority boundaries.
- Habitat mitigation – existing partnership between Teignbridge, Exeter and East Devon to address the impacts of development upon European designated sites.
- Landscape – considering the AONB and any allocations that may impact upon adjoining local authorities.
- Green infrastructure – including nature delivery and recreation, such as the protection and enhancement of the Clyst Valley Regional Park, providing recreation opportunities to the east of Exeter.

Implications for the Local Plan and SA

- 2.22 The Local Plan should reflect the NPPF “presumption in favour of sustainable development” to meet community needs for new housing, in sustainable locations, whilst improving the environment and mitigating and adapting to climate change. The SA should include objectives to reflect this, and the process of appraising options and recommending mitigation measures should ensure a sustainable outcome.
- 2.23 The Local Plan should include policies that will contribute towards meeting climate change targets, for example through low/zero carbon homes, encouraging renewable energy, and minimising the need to travel; whilst the SA should include an objective relating to climate change. The Local Plan should also ensure new development is resilient to effects of climate change.
- 2.24 The Local Plan should incorporate biodiversity net gain, and any other targets as they are brought forward in preparing the Plan, as set out in the Environment Act 2021. The SA should include objectives to conserve and enhance biodiversity. The Local Plan should reflect landscape sensitivities in identifying sites for development, whilst the SA should consider landscape impact when assessing site options, recommending mitigation measures where appropriate – particularly for development that could affect the two AONBs located in East Devon. Similarly, the Local Plan should recognise heritage assets in conserving and enhancing the historic environment; and the SA should identify effects on the historic environment.
- 2.25 Policies in the Local Plan should support the economy and the SA should include objectives that reflect this aim. The SA process of appraising options, assessing economic effects, and recommending mitigation measures, should support the economy.
- 2.26 National policy and guidance relating to high quality design should be reflected in Local Plan policies, including through the use of internal space standards where justified, and SA objectives should address the built environment and design of neighbourhoods.

- 2.27 The Local Plan should optimise the use of water resources in new development, ensuring they are resilient to future droughts due to climate change. This could include setting design standards for water usage in new dwellings. The SA should ensure water resources and climate change are included in objectives. Similarly, the Local Plan should consider the impact of future development upon water quality, and the SA should include an objective relating to water quality.
- 2.28 Mineral resources should be safeguarded where possible, and the use of local building stone in new development can deliver high quality design. Similarly, with regards to land resources, the Local Plan can ensure sustainable waste management by supporting the waste hierarchy as appropriate. An SA objective relating to land resources can deliver these aims.
- 2.29 The provision of infrastructure should support the delivery of housing and economic development – this includes transport, digital connectivity, education, healthcare, open space, and sports provision. Infrastructure issues can be considered through several SA objectives such as providing access to community facilities and services, sustainable travel links, and open space.
- 2.30 All of the implications above should be considered in the context of the duty to co-operate, which may identify cross-boundary implications that should be addressed; for example, in relation to housing need, environmental impacts of development, and infrastructure requirements.

3 Baseline information

- 3.1 In order to undertake the SA work it is important to have an understanding of the baseline i.e. “where we are now”, so that local plan strategy and policy choices can be informed by the current position. This Stage A2 reflects on the current state of the environment, society and economy, and those characteristics which are most likely to be affected by a new Local Plan. This understanding allows us to not only consider the likely effects and impacts of the local plan but also to understand how it can make positive contributions in the future.
- 3.2 Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out a number of topics that must be considered and presented in an SEA, these are as follows:
- Biodiversity
 - Population
 - Human health
 - Fauna
 - Flora
 - Soil
 - Water
 - Air
 - Climatic factors
 - Material assets
 - Cultural heritage including architectural and archaeological
 - Landscape
- 3.3 The above are assessed in this scoping report but also to broaden out the basis for the work, specifically to meet Sustainability Appraisal specific requirements, assessment work also looks more broadly at social and economic considerations.
- 3.4 This paper splits the sustainability matters into environmental, social and economic categories, and these form sub-headings in this chapter, with more detailed themes and issues sitting under these. However, it should be noted that much of the information recorded in this report could comfortably sit under any or all of the three main strands of sustainability and indeed under differing sub-headings. To avoid repetition this Scoping Report has sought to include the information under what is considered to be the most appropriate heading. However, sustainable development is, by its nature, a holistic concept and therefore the various themes, by implication, interact and cross boundaries.
- 3.5 East Devon District Council publish a bi-annual report called ‘Knowing East Devon’, see: <https://eastdevon.gov.uk/media/3720891/knowning-east-devon-version-14-2019-access-checked.pdf> the most recent draft was dated 2019 and it contains a considerable amount of information about the district, especially in respect of social and economic matters. This report is produced for the Council by Place Analytics and much of the content of this scoping report, specifically in this chapter, has been taken from this report. However, additional information and text has also been incorporated where it helps expand on subject matters or provides more up to date or relevant information.

- 3.6 It should be noted that there are some quite marked variations in the environmental, social and economic make-up across differing parts of East Devon and this work picks up on not just an overarching East Devon wide picture but where information and data is available it seeks to drill down to smaller scale geographies.
- 3.7 As well as commenting on the current state of affairs the SA work comments on potential impacts and implications that could arise without the benefit of a local plan or a coherent set of planning policies.

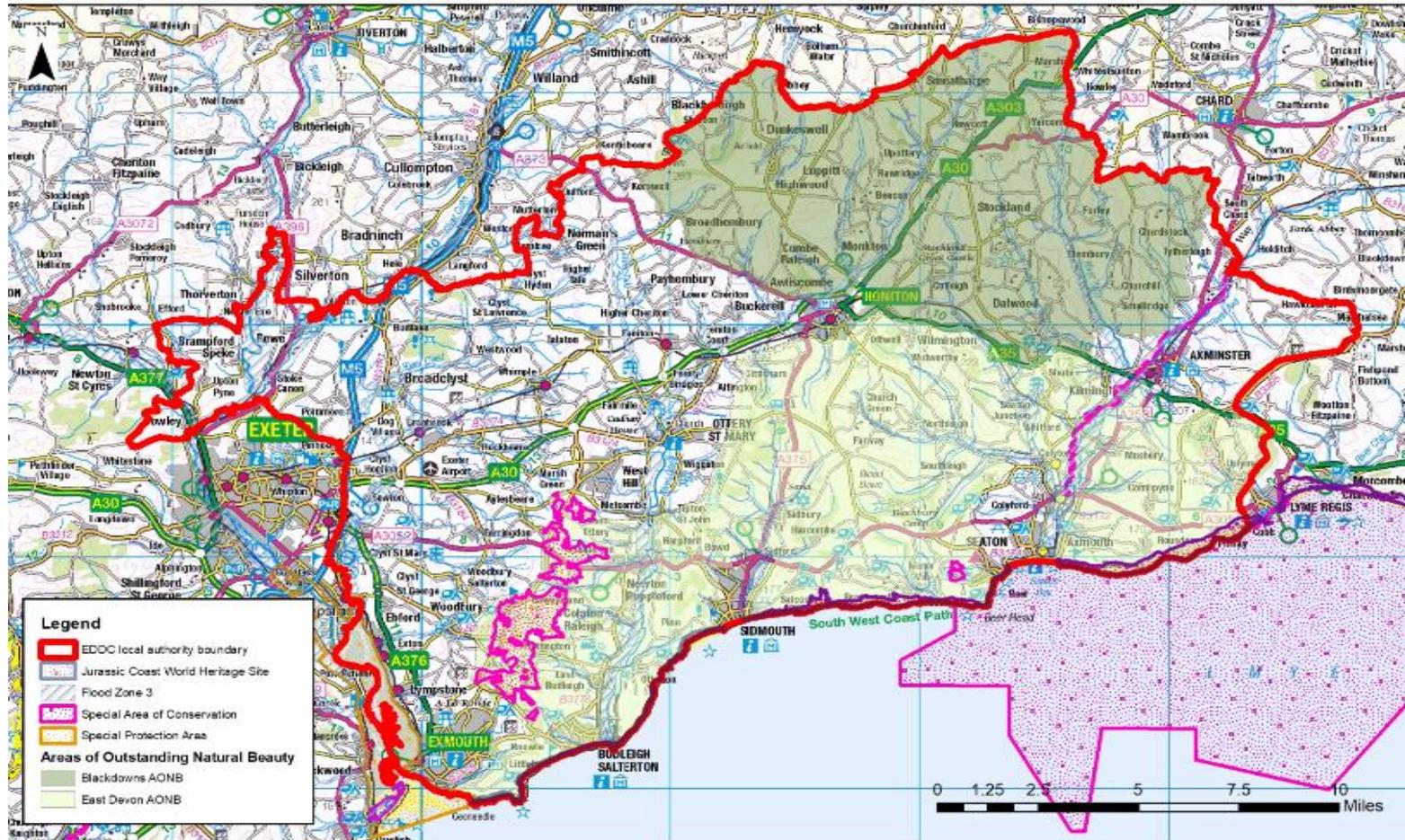
Impacts of Covid-19

- 3.8 The data and information in this scoping report largely dates from before Covid-19. The pandemic, starting from early 2020, can be expected to have short term as well as potentially long term impacts. At this stage it is not possible to state what these impacts, especially over the long term, may prove to be. This scoping report in any redraft, or more likely appraisal work that follows from it, may require updating over time to take into account possible impacts, but in its present draft it reports on published (largely pre Covid-19) data and information that is available.

Key environmental baseline data

- 3.9 East Devon benefits from a very high quality environment with an exceptional landscape, great biodiversity resources and outstanding heritage assets. Commentary in this section provides an overview of the state of East Devon's natural, built and historic environment, highlighting the qualities of the area as well as the concerns and challenges that exist. The following map shows the most important natural environment designations in East Devon. Detailed mapping of these designations and many others, along with habitats and species maps is available at [MAGIC \(defra.gov.uk\)](https://defra.gov.uk)

Figure 3.1: Key environmental designations in East Devon



Biodiversity in East Devon

- 3.10 Biodiversity refers to the variety of life on earth, including the different species of animals, plants, and micro-organisms that coexist. East Devon is home to an abundance of rare species (including dormice, otters, reptiles, bats and birds) and home to important habitat types, including woodland, meadows, hedges, heaths, ponds as well as a varied coastline.
- 3.11 Many sites and land areas in East Devon, on account of their habitat types and/or species present, are protected by national and European Union legislation. The exceptional wildlife and biodiversity of East Devon is important in its own right but also it provides a highly appealing asset and attraction that enhances the quality of people's lives, and supports many jobs, for example in tourism and wildlife friendly land management.

Statutory wildlife designations in East Devon

- 3.12 The highest tier of wildlife sites in England (and across the countries of the European Union) are Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). There is a further designation, Ramsar sites that although established through different means, are afforded the same protection as the SPAs and SACs.
- 3.13 There are four SACs in East Devon, these are:
- Beer Quarry and Caves (rare bats);
 - East Devon Pebblebed Heaths (lowland heathland);
 - River Axe (supporting floating vegetation and rare fish); and
 - Sidmouth to West Bay (sea cliffs).

Lyme Bay and Torbay (reefs and sea caves) is a currently a candidate SAC (and a Site of Community Importance) – it is treated in planning terms as an SAC.

- 3.14 There are also two SPAs,
- the Exe Estuary (also a Ramsar site and designated for waterbirds); and
 - East Devon Pebblebeds (Dartford warbler and nightjar).
- 3.15 Evidence⁹ shows that all new dwellings within 10km of the Exe Estuary and/or Pebblebeds SPAs will have a significant effect on protected habitats and mitigation is required in the form of a charge per new dwelling.
- 3.16 There are a number of further European Sites within 20 kms of East Devon. Sites beyond East Devon but which planning and development decisions in East Devon could impact on need to be taken onto

⁹ South-east Devon European Site Mitigation Strategy, June 2014: [se-devon-mitigation-strategy.pdf](https://www.eastdevon.gov.uk/se-devon-mitigation-strategy.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk))

account in when making planning policy. Separate assessment under the Habitat Regulations will be undertaken to look at potential issues and mitigation associated with development that could adversely impact on this highest tier of wildlife sites.

- 3.17 There are 26 Sites of Special Scientific Interest (SSSIs) falling wholly or partly in East Devon. These are sites designated for wildlife and/or geological interest. Site conditions are varied though the Government has set (in Biodiversity 2020) national targets for 50% of SSSI to be in favourable condition and 95% to be in favourable or unfavourable recovering condition by 2020. There is two National Nature Reserves in East Devon, at the Axmouth to Lyme Regis Undercliffs; and the Pebblebed Heaths.

Other designations and Priority habitats and species

- 3.18 The East Devon Local Plan 2013-31 advises that there are approximately 300 non-statutory County Wildlife Sites (CWS) in East Devon as well as many other County Geological Sites and Local Nature Reserves. Priority habitats and species are also present in East Devon,¹⁰ with Ancient Woodlands and a wealth of UK Priority habitats (such as grazing marsh, lowland meadow, lowland heathland, hedgerows and coastal habitats). It is important to note that many of these habitats are of CWS and SSSI standard but have no formal designation.
- 3.19 Ancient woodland are an irreplaceable natural resource that has remained constantly wooded since at least AD1600 with a number of such wooded areas across the District. The length of time ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats of ancient woodland sites support many of the UK's most important and threatened fauna and flora species and ancient woodlands cannot be re-created. Similarly, ancient or veteran trees have exceptional biodiversity, cultural or heritage value, and can also be found in East Devon – these are generally found outside of woodland and are therefore more vulnerable to the impact of development.
- 3.20 Approximately one quarter of priority UK Biodiversity Action Plan species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.
- 3.21 A number of species are afforded particular protection specifically on account of their rarity. In some cases protected species will be found on designated sites (designation can be justified on account of their presence) but also these species may be found in or on non-designated areas. European protected species found in East Devon, amongst others, include otter (widespread on rivers), dormice (widespread in woodlands, hedges and scrub), Great Crested Newts and bats, noting that East Devon supports Greater Horseshoes, Lesser Horseshoes, Barabastelle and Bechstein bats which are all Annex 1 species.

¹⁰ Further information on UK BAP priority habitats and species is available at: [UK BAP | JNCC - Adviser to Government on Nature Conservation](#)

Wildlife more generally

3.22 Most of East Devon does not, however, fall within area designated for nature conservation value though great un-designated swathes of the district are of importance for wildlife. Farmland (particularly where not intensively managed) and hedgerows, trees and woodland,¹¹ parks and open spaces of all sorts can be important for wildlife and the public enjoyment of wildlife; as are the district's rivers and their drainage networks. In addition domestic gardens can be of real significance for wildlife and just simply for human enjoyment of outdoor space.

Threats to biodiversity and opportunities for enhancement

3.23 Notwithstanding the important biodiversity that East Devon supports, there has been, in common with the national picture a decline in biodiversity and loss of habitats across East Devon over past decades.

3.24 Wildlife and habitat are vulnerable to a number of threats, these include:

- changing agricultural practices and particularly agricultural intensification (over past decades this has had the biggest adverse impacts on wildlife);
- habitat fragmentation/isolation;
- urbanisation impacts (including lighting, traffic collisions, fire, noise, cat predation, invasive species, pollution, limitations on the space for rivers and estuaries to naturally adjust and adapt to change);
- air and water quality/quantity impacts;
- historic legacy impacts to rivers, including from infrastructure, dredging and land management; and
- recreational impacts.

3.25 Whilst significant adverse impacts have occurred there are, however, opportunities to improve the biodiversity interest. Rebuilding Devon's Nature Map¹² identifies the priority areas (river corridors and Strategic Nature Areas) in Devon for expanding our wildlife habitats. However, there are also opportunities in and around development sites for wildlife enhancement.

3.26 Legislation (The Environment Act 2021) now requires a net gain in biodiversity, and the degree to which such enhancement will be sought will be set out in local plan policy.

The landscape and seascape of East Devon

3.27 East Devon has exceptional landscape qualities and the planning system gives great weight to conserving landscape and scenic beauty, specifically including Areas of Outstanding Natural Beauty

¹¹ There are multiple benefits of trees and woodland, such as slow water in surface run-off, improve water quality by absorbing pollutants, scrub air of pollutants, provide summer shading, provide landscape screening, capture carbon, and biodiversity enhancements, provide sustainable construction material.

¹² See: [Rebuilding Devon's Nature Map – DBRC](#) and Strategic Nature Areas within East Devon: [OverallmapEastDevon.jpg \(1753x1241\) \(dbrc.org.uk\)](#)

(AONBs). The East Devon AONB falls entirely in East Devon as does most of the Blackdown Hills AONB, they collectively cover around two thirds of the District. A very small part of the Dorset AONB also falls in East Devon.

- 3.28 There are distinct variations in the character of the landscape across East Devon as described in the East Devon and Blackdown Hills Landscape Character Assessment, see: https://eastdevon.gov.uk/media/2816886/lca_complete_final_march-2019_low-res.pdf. Broad types of landscape include valleys, scarp slopes, estuaries, cliffs, rolling hills, plateaux and ridges. However, although varied, there are comparatively few areas of low lying flat land and the vast majority of the landscape is characterised in some form by undulating topography.
- 3.29 Away from the main towns of East Devon the District is predominantly rural, characterised by a land cover of fields, hedges, copses and woodland with a settlement pattern of villages, hamlets and isolated dwellings and farmsteads. This rural character is reflected in dark sky and tranquillity mapping.¹³ Many settlements have distinct relationships with their landscape, located on intersections of historic routes, at water sources and crossings, but away from wetlands or exposed areas. Many have distinct identities and traditional vernacular character reflecting a long history of human settlement, locally available building materials and agricultural land use. The rural setting and identity of many settlements is valued and protected as is evident from designations that seek to maintain their open, undeveloped character. The character of historic built cores of many are also valued, evident from conservation area designations.
- 3.30 In some parts of East Devon, however, major road and rail corridors and pylons dissect the landscape and there are distinct areas of modern and recent development including the growth areas around Exeter Airport and Cranbrook. There are also numerous medium to large-scale solar farms in East Devon.

The East Devon coast

- 3.31 Seascape is defined as a view of an expanse of sea, and East Devon benefits from a stunning coastline and International recognition, on account of geological interest and importance, with the Dorset and East Devon Coast World Heritage Site (the “Jurassic Coast”). Other designated heritage assets along the coast include scheduled monuments, and listed buildings. The coastline is cliff dominated with some sandy but mostly rocky beaches. The coastline provides residents and visitors with opportunities for work in tourism and maritime industries as well as recreational opportunities, it provides an exceptionally attractive place to play and relax.
- 3.32 The coast of East Devon is subject to ongoing erosion from wave’s and the sea’s activity as well as water flowing from the land. Impacts are exacerbated by rising sea levels. It is important to note, however, that the status of the World Heritage Site rests in part on this erosive activity.

¹³ Dark sky map: [England’s Light Pollution and Dark Skies \(cpre.org.uk\)](https://cpre.org.uk/) ; Tranquillity map: [tranquillity_map_england_regional_boundaries_1.pdf \(cpre.org.uk\)](https://cpre.org.uk/) . Both prepared by Campaign to Protect Rural England.

- 3.33 In addition to the cliffs and beaches the landward site of the coast has an outstanding patchwork of flora and fauna.
- 3.34 The coastline of East Devon is mostly undeveloped though there are towns and villages located in valley systems that cut through higher land to the sea. Fishing and maritime activities remain commercially important activities in many of these towns and villages and tourism forms a significant part of the economy.
- 3.35 It is important to note the inter-relationships between landscape, seascape, townscape and the historic environment. For example, the conservation and enhancement of cultural heritage is an important consideration in AONBs; Registered parks and gardens are areas of designated landscape as well as being designated heritage assets; and important landscapes, townscapes and seascapes often form the settings of heritage assets.

Historic environment, built heritage and design quality

East Devon's historic environment

- 3.36 Many millennia of human occupation in East Devon has left a rich legacy of historic buildings, structures and spaces, historic landscapes and archaeological sites and monuments. This heritage forms a fundamental feature of the physical fabric and cultural identity of East Devon. Collectively these are referred to as heritage assets, defined as “a building, monument, site, place, area or landscape as having a degree of significance meriting consideration in planning decisions, because of its heritage interest” (NPPF, Annex 2: Glossary). A significant proportion of historic buildings and areas in East Devon are valued and protected as designated assets: Listed Buildings, Conservation Areas, Registered Historic Parks and Gardens or Scheduled Monuments. In addition, non-designated assets are those identified by local planning authorities as having a degree of heritage significance but which do not meet the criteria for designated heritage assets. It is important to note that the settings of heritage assets can positively contribute to their significance.
- 3.37 The table below (figure 3.2) identifies designated heritage assets in East Devon, with a map of heritage and landscape designations on the following page. There are numerous non-designated assets in East Devon, including 23 identified on East Devon's local list¹⁴ and those shown on the Devon Historic Environment Record. As highlighted in chapter 2, East Devon District Council has an adopted heritage strategy¹⁵ which contains further detail on baseline information for the historic environment in East Devon. In addition, conservation area appraisals assess the setting, built environment, features of special importance and potential threats to these areas.¹⁶

¹⁴ East Devon local list of heritage assets [east-devon-list-of-local-heritage-assets-december-2020.pdf](https://eastdevon.gov.uk/media/3413423/final-heritage-strategy-2019-2031.pdf) (eastdevon.gov.uk) ; Devon Historic Environment Record [Historic Environment Record \(HER\) - Devon County Council](https://eastdevon.gov.uk/media/3413423/final-heritage-strategy-2019-2031.pdf)

¹⁵ See: <https://eastdevon.gov.uk/media/3413423/final-heritage-strategy-2019-2031.pdf>

¹⁶ Available at: [Conservation areas - East Devon](https://eastdevon.gov.uk/media/3413423/final-heritage-strategy-2019-2031.pdf)

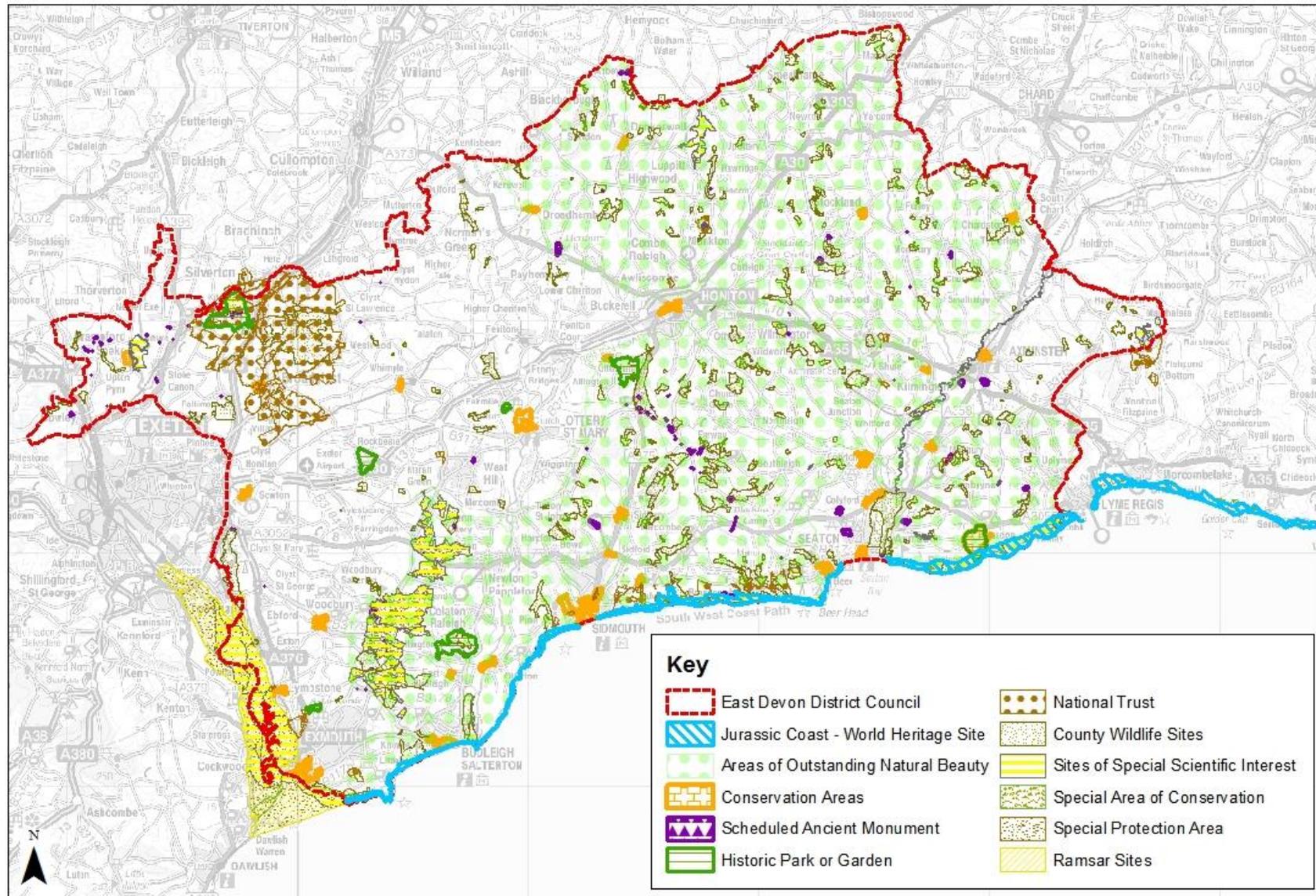
Figure 3.2: Designated Heritage assets in East Devon¹⁷

| | East Devon |
|-------------------------|--|
| Listed Buildings | 3,090 (comprising 54 Grade I, 184 Grade II*, 2,852 Grade II) |
| Scheduled Monuments | 112 |
| Registered Park/Gardens | 8 (comprising 1 Grade I, 1 Grade II*, 6 Grade II) |
| Conservation Areas | 34 |
| World Heritage Sites | 1 |

3.38 The 'Heritage at Risk' Register, updated annually, identifies sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. There are 29 entries located in East Devon in the latest register (2021) – the only asset where inappropriate development is identified as being an issue, and thus relevant to Local Plan production, is at Bicton Registered Park and Garden.

¹⁷ Historic England's Local Authority Profiles: [Indicator Data | Historic England](#) ; East Devon Heritage Strategy 2019-31: [final-heritage-strategy-2019-2031.pdf \(eastdevon.gov.uk\)](#)

Figure 3.3: East Devon Heritage and Landscape designations



- 3.39 Heritage assets, in their various forms, can require ongoing use and management if they are to remain in good condition. They are, however, highly vulnerable to negative impacts from poor quality and inappropriate works and activities. Examples of opportunities and threats to the historic environment include mitigation and adaptation to climate change, coastal erosion and flooding, challenges facing historic town centres, and the role of the historic environment in promoting health and well-being.

Design quality

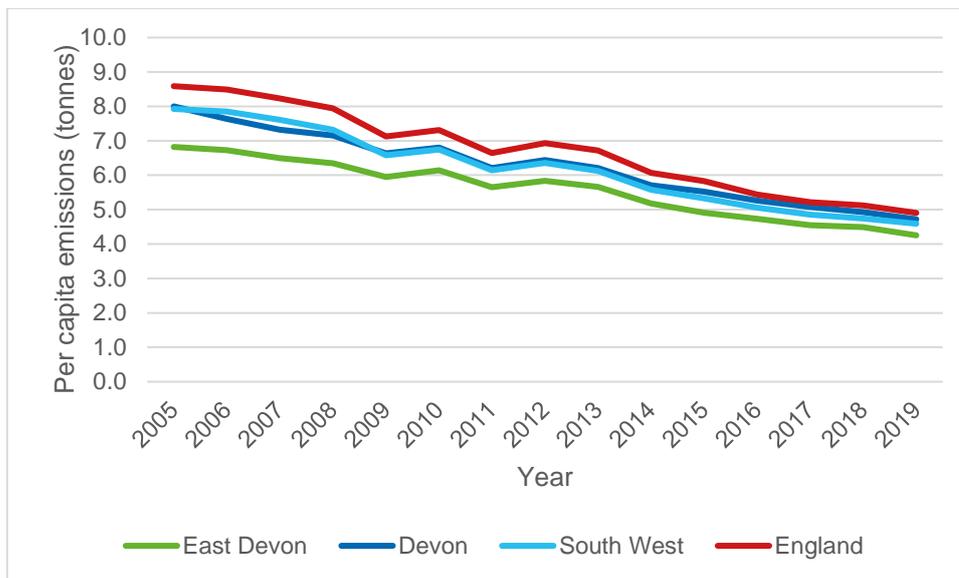
- 3.40 The design quality of new development (and that built in recent years) in East Devon varies greatly and it can be a challenge to uphold high design standards. Much building work is undertaken to national design standards using materials that are not local and design approaches that are not reflective of or sympathetic to local vernacular styles or not innovative in approach. For instance, heritage assets can make a positive contribution to local character and distinctiveness as set out in the NPPF and National Model Design Code.
- 3.41 The existing East Devon Local Plan does, none the less, include design policies which encourage high quality urban design in new developments. There are various measures which could be used to measure design quality of new development, such as the number of schemes which score highly in the 'Building for Healthy Life' system. However, consistent monitoring of recent development has not been undertaken and the onus typically rests on encouraging good design and 'testing' planning applications coming forward.

The changing climate and carbon emissions

Climate change

- 3.42 Climate change is the effect of direct and indirect human activity *“that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods”* United Nations Framework Convention on Climate Change (UNFCCC) (Article 1:2, p.7). The potential impacts and implications of further climate change, noting the world is warming, include more extreme weather events, flooding, coastal erosion and loss of species and habitats.
- 3.43 Reducing carbon dioxide (CO₂) emissions in the atmosphere is a national objective. This is driven by the Climate Change Act (2008), which sets a legally binding target of at least a 34% reduction in UK emissions by 2020 and net zero by 2050, against a 1990 baseline. The graph below shows per capita CO₂ emissions for East Devon, Devon, the South West region and England from 2005 to 2019.

Figure 3.4: Carbon dioxide emissions 2005-2019 - tonnes per capita¹⁸

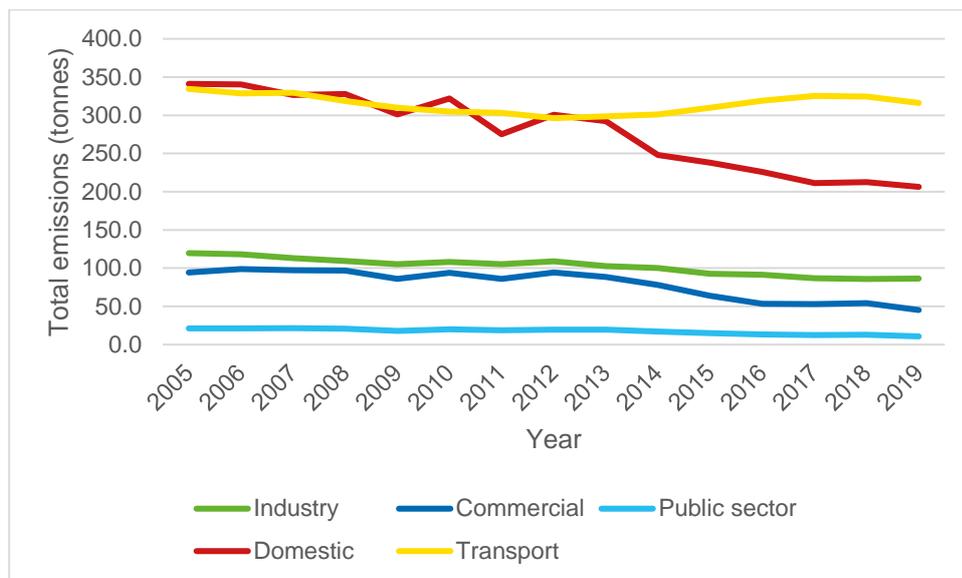


- 3.44 The graph shows a clear pattern of declining carbon dioxide emissions per person over the period from 2005 to 2019. It also shows emissions per person being lower in East Devon compared to Devon, South West, and England, although the gap has narrowed over recent years. In 2005 there were 6.8 tonnes per person emitted in East Devon compared to an England figure of 8.6, the South West at 7.9, and Devon at 8. By 2019 the differences between East Devon, Devon, regional and national level were much closer, with comparative figures ranging from 4.3 tonnes per person to 4.9 per person.
- 3.45 The main drivers of the fall in emissions were a decrease in the use of coal for electricity generation and a reduction in the use of natural gas for space heating. The figure below/over the page shows the changes in emission levels in East Devon over the period of 2005 to 2019, broken down into five sectors. Emissions from all sectors have reduced, but to varying degrees. Commercial and public sector emissions have fallen by half, whilst transport, the biggest emitter, has only seen a slight decline and indeed is similar to total emissions back in 2008.

Figure 3.5: East Devon carbon dioxide emissions 2005-2019 by sector¹⁹

¹⁸ UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019: [UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹⁹ UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019: [UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)



Climate change adaption

3.46 Despite efforts to reduce levels of CO₂ emissions, and even if worldwide carbon and other greenhouse gas neutrality was achieved immediately, the effects of a changing climate can be expected to continue over the coming years. There is, therefore a need to adapt to a changing environment and this will affect the world we live in and how we need to plan for it. The natural environment must be given space and support to adapt to climate change.

Flood risk

3.47 Some areas within East Devon are at risk from fluvial (river), pluvial (surface water) and coastal (tidal) flooding. Development within these areas also has the potential to exacerbate flooding elsewhere and under an increasingly heated earth there is the very real likelihood that the flooding concerns will be greater in the future.

3.48 The extent of the flood zones in East Devon are shown in figure 3.6. The map shows all areas within flood zone 1 (shown as 'clear'), flood zone 2 (light blue) or flood zone 3 (dark blue) in East Devon. Flood zone mapping is undertaken by the Environment Agency and the zones are defined as:

- Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)
- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year
- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

Note: These flood zones refer to the probability of river and sea flooding, ignoring the presence of defences²⁰.

Figure 3.6: Flood Zones 2 and 3 in East Devon



3.49 It should be noted that flood zone mapping is subject to review and updates and as more information is understood about global warming such reviews could show greater areas being vulnerable to flooding. Other localised areas across the District, not showing on flooding maps, may also be at risk, often associated with minor watercourses through urbanised areas.

3.50 Within East Devon there are also areas and properties at risk from surface water flooding – most notably are critical drainage areas (CDAs) where there are critical drainage problems meaning a need for surface water to be managed to a higher standard than normal to reduce flood risk. There are currently three CDAs in East Devon, covering land to the east of Whimble, west of Feniton, and east of Axminster.²¹

²⁰ See the Flood map for planning at: [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.flood-map-for-planning.service.gov.uk)

²¹ Further information on the CDAs can be seen at: [Planning and development - Flood Risk Management \(devon.gov.uk\)](https://www.devon.gov.uk)

Coastal flooding and erosion

- 3.51 The flooding maps show areas of coastline that are potentially liable to flood and in many cases, in urbanised areas, sea defences may be built. The Exe Estuary Strategy (Managing Flood and Coastal Erosion Risk for the Exe Estuary, Environment Agency 2014) concluded that it would be necessary to defend most of the developed coastline, although some of the defences might need to be moved or altered over time. It should be noted that some aspects of this Strategy are not being brought forward, for example the proposed managed realignment at Clyst, and mitigation for short to medium term impacts on the estuary to be delivered in the Otter Estuary.
- 3.52 In addition, and sometimes related, to flooding concerns is the process of coastal erosion. Large parts of the coastline of East Devon is subject to erosion and work being undertaken by the University of Plymouth is mapping out projected vulnerability to loss to the sea of the coast of the District. At the time of drafting this report, draft mapping work covers the coastline from Sidmouth to the East Devon border with Dorset.

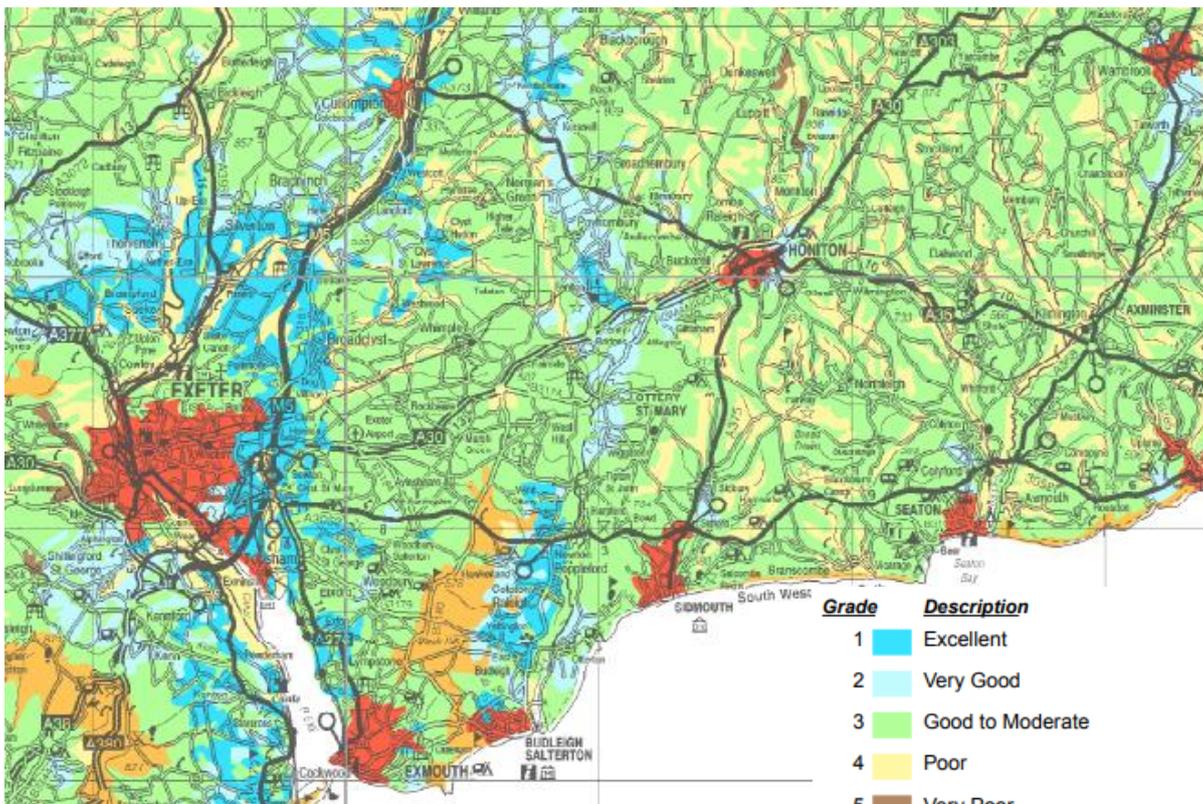
The land resources of East Devon

Soil quality

- 3.53 Soil is a fundamentally important natural resource that has developed over the millennia. Due to its varied geology East Devon has a number of different soil types.
- 3.54 The best and most versatile agricultural land is defined as Grades 1, 2 and 3a. Poorer quality land falls within Grades 3b, 4 and 5. This grading system considers climate, gradient, flood risk and soil quality. In broad terms, Grade 1 land is concentrated in or close to the Exe valley on the western edge of the District and more generally in valley systems. It is important to note that whilst higher grade land is more productive in agricultural terms it is often the case that lower grade land, especially where it has been less intensively farmed, will be of greater importance for wildlife and biodiversity. The following map shows the strategic assessment of agricultural land quality in East Devon – note that this does not show the subdivision of grade 3, which has only been assessed in a few locations in East Devon.

Figure 3.7: Agricultural land classification map²²

²² Map extract obtained from [Agricultural Land Classification Map South West Region - ALC006 \(naturalengland.org.uk\)](https://naturalengland.org.uk)



3.55 The main threats to soil quality in Devon relate to land in natural, countryside or agricultural uses, and include erosion by flooding and surface water runoff, intensive cultivation, poor forestry practice and trampling by grazing animals. These threats fall largely outside of the control of the planning system. However, development and urbanisation is clearly a planning matter and development in general can result in loss or damage.

Land contamination

3.56 Many areas of land become contaminated by residues left behind by activities such as waste disposal and general industrial processes. Until the contamination is treated the land may be severely restricted in how it may be used in the future.

3.57 During a ten year period from 2001, in East Devon, over 700 potentially contaminated sites were listed on the basis of their former uses. However over the same timescale no new sites were determined as 'contaminated land', although several are subject to ongoing investigation and works by landowners. Two of the council's priorities are to encourage voluntary remediation and promote the re-use of brownfield land, using the Local Plan, planning process and regeneration proposals.

Brownfield land

3.58 Brownfield land (also referred to as Previously Developed Land) is land that has previously been built-on or developed and which frequently will be in a despoiled state. The supply of brownfield land assessed as being suitable for redevelopment is shown in the following table. The land identified as being potentially suitable for redevelopment still makes up a relatively small proportion of overall potential land supply and the absence of a heavily industrialised past has meant that East Devon does not have the brownfield land legacy that many more urban areas have.

Figure 3.8: East Devon Brownfield Land Register 2020 – headlines

| | East Devon |
|---------------------------------|------------|
| Number of Sites on Register | 27 |
| Total Area of Sites in Hectares | 24.6 |

Minerals

3.59 The varied geology means there are a range of minerals worked across East Devon. There are Mineral Safeguarding Areas (MSAs) concentrated through the western part of East Devon stretching from Exmouth towards the county border with Somerset near Wellington.²³

Waste

3.60 Household waste generated per head in East Devon is among the lowest in Devon, second only to Exeter.²⁴ East Devon’s recycling rate has grown significantly over the last 15 years to become the highest in Devon, and amongst the highest in the country, shown in the table below.

Figure 3.9: Recycling Rates (%)²⁵

| Area | 2004/05 | 2011/12 | 2014/15 | 2019/20 | 2020/21 |
|-------------|---------|---------|---------|---------|---------|
| East Devon | 16.4 | 48.5 | 46.3 | 60.5 | 60 |
| Exeter | 20.7 | 36.2 | 33.8 | 26.1 | 27.8 |
| Mid Devon | 17.8 | 49.2 | 48.2 | 53.1 | 53.7 |
| Teignbridge | 26.9 | 57.3 | 53.7 | 56.3 | 55.9 |
| Devon | 32.7 | 55.3 | 55.4 | 56.6 | 55.3 |

The water quality of East Devon

Water quality

²³ MSAs can be seen in the Devon Minerals Plan Policies Map: [Devon Minerals Plan Policies Map.pdf \(sharepoint.com\)](#)

²⁴ [Waste Performance Statistics 2020 21.pdf \(devon.gov.uk\)](#)

²⁵ Sources: Devon Waste Plan 2014; Devon Waste & Resource Management Strategy Review & DEFRA (2015) Local Authority Collected Waste Statistics – Local Authority Data; [Waste Performance Statistics 2020 21.pdf \(devon.gov.uk\)](#)

- 3.61 Water is a critical resource in terms of meeting human needs as well as being of wider environmental importance.
- 3.62 Surface water includes rivers, lakes, estuaries and (under council planning control) the coast down to the mean low water mark. The waters are important in their own right but so are associated floodplains and wooded banks. A surface water's overall quality is assessed as a combination of its ecological and chemical quality.
- 3.63 The biggest rivers in East Devon are the Exe, Otter and the Axe. The largest is the River Exe, whilst much of its length falls outside East Devon, it does reach the sea at Exmouth. Adequate quantity, quality and timing of water flows is required to sustain ecosystems and the valuable clean water that they provide.
- 3.64 The ecological status for surface freshwaters, estuaries and coastal water bodies varies across East Devon. In the most part, surface water quality is moderate to good across the plan area, with a small incidence of poor quality affecting parts of the Exe Estuary and other locations. Common reasons for less than good status include impacted fish and diatom (algae) communities; physical modification; and phosphate, which can be linked to fertilisers used in farming and other pollutants. The River Axe is a case where phosphate pollution has been identified as significant in terms of impacts on the designated Special Area of Conservation.
- 3.65 Other impacts on water quality may come from pollution from road run-off, and overflow of sewage from combined sewerage systems after heavy rain. The physical form and function of rivers are also under pressure and key to supporting biodiversity and landscape value throughout the district, including impacts of the River Otter on infrastructure, and fish passage connectivity along the River Sid.
- 3.66 A recent project initiative of South West Water (SWW) called 'Upstream Thinking' is an environmental improvement programme aimed at improving water quality in river catchments to reduce water treatment costs
- 3.67 Groundwater quality varies across East Devon. The majority of the District has some poor chemical status with pockets of good status for instance around the Yarty and Axe. Surface water sources provide the majority of the supply from reservoirs and river intakes across the northern part of the district, the most significant reservoir supply being Wimbleball. The water supply for the southern half of East Devon comes from deep underground boreholes.²⁶ Drinking Water Safeguard Zones have been designated where the land use is causing pollution of the raw water. Groundwater bodies that fall into this category are located between Ottery St Mary and Otterton. Human health is not at risk from these sources because SWW provide extra treatment.

²⁶ [Water hardness \(southwestwater.co.uk\)](https://www.southwestwater.co.uk)

Key social baseline data

3.68 This section covers issues relating to social considerations – falling under the broad headings noted below:

- The population and homes of East Devon;
- Health in East Devon;
- Wellbeing in East Devon; and
- Access to services.

The population and homes of East Devon

The population make up

3.69 East Devon has a population of just under 146,300 people, the highest of the eight districts in Devon. The 10 years from 2009 to 2019 saw significant growth, with East Devon's population growing by around 14,000 people in that time.²⁷ Nevertheless, East Devon remains sparsely populated with 180 people per square kilometre – the England average is 432.²⁸ Past evidence suggests that East Devon falls within a larger 'Greater Exeter' housing and functional economic market area, comprising the four districts of East Devon, Exeter, Mid Devon and Teignbridge.²⁹

3.70 Exmouth has by far the largest population in East Devon at nearly 36,000, nearly three times that of Sidmouth, the second largest town. Honiton's population is slightly below Sidmouth, and then there is a gap to five settlements with around 7,500 to 4,300 people (Seaton, Axminster, Ottery St Mary, Budleigh Salterton, Cranbrook). As a developing new town, Cranbrook's population is growing more quickly than elsewhere, and is predicted to be around 18,000 people when complete in the early 2030s. Colyton is largest of the other settlements, leading a cluster of 11 settlements with 1,500-2,000 people. Beer, Whimble, Clyst St Mary and Kilmington all have around 1,000 people, and below this, the population of a series of smaller settlements ranges from around 200 to 800 people.³⁰

3.71 Residents of East Devon are among the oldest in the country with a median age of 51.2, compared to the UK figure of 40.3. The proportion of those aged 65 plus in East Devon is 30.4%, the third highest of any local authority in the UK and far higher than the national average of 18.5%³¹ – this elderly population is projected to grow in the years ahead. The age profile varies across different settlements with more than 40% of the population over 65 years old in Sidmouth, Seaton, Budleigh Salterton, Colyford (highest at 60%), and East Budleigh. However in Cranbrook just 4% of people are over 65,

²⁷ Mid-2019 population estimates, ONS, published June 2020:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2019estimates#toc>

²⁸ Mid-2019 population estimates, ONS, published June 2020.

²⁹ Local Housing Needs Assessment for the Greater Exeter Area, May 2020; Greater Exeter Economic Development Needs Assessment, March 2017. Available at: [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk)

³⁰ Population estimates – small area based by single year of age – England and Wales, 2019, Nomis: <https://www.nomisweb.co.uk/>

³¹ Mid-2019 population estimates, ONS, published June 2020.

and 34% are aged 0 to 15 (twice as high as the district average), indicating this new town is popular for families with children.³² Cranbrook also has one of the highest proportions of working age people aged 16-64 (62%) – other settlements with a proportion over 60% are Exton (highest at 84%), Broadclyst, Woodbury Salterton, Colaton Raleigh, Clyst Honiton and Brampford Speke. This suggests either a high level of jobs at these settlements, or that they are within an easy commute to jobs elsewhere. By far the highest number of working age people can be found in Exmouth with nearly 20,000, three times Honiton in second. Below Sidmouth, there is again a cluster of five settlements with 2 – 3,000 residents of working age, which drops off to around 1,000 and below for the remaining settlements.

- 3.72 The elderly population profile has an impact on the provision of health care, housing requirements, the labour market, and economic growth in the District and a further aging population will present additional challenges.

The potential future population of East Devon

- 3.73 For many years there has been an overall pattern of population increase in East Devon, with more people moving into the district than leaving. It is this net in-migration, particular by the middle aged (with an associated in movement of older school children) and older people that is the primary factor accounting for the increasing population change. In contrast, however, there is a pattern of net out-migrations of younger adults.
- 3.74 The increasing population, alongside a decreasing average household size (less people on average living in each home) has informed house building needs. Though other factors such as economic growth policies and job creation projections have been important in East Devon in terms of determining housing provision. More recently, as set out in the Government's Planning White Paper consultation document of August 2020, there is a Government aspiration for the affordability of housing to be a very major determinant of future housing requirements.
- 3.75 In a housing needs report for the council from ORS³³, drawing on Office for National Statistics records, there is a projected population increase in East Devon of 23,343 people over the 20 year period from 2020, with the population of 145,871, going up to a 2040 population of 169,214. This amounts to a projected annual average increase in population of 1,167 persons. On the basis of these projections, and with people generally living longer, the ORS work shows that there will be a marked increase in older people in the district, specifically those aged 65 and older. For aged group below 65 comparative population changes between the 2020 and 2040 are not as significant with most five year age bands seeing moderate increases in population, and the greatest increases being in 40 to 50 year olds and 15 to 19 years old.
- 3.76 In their report ORS advise of a 20 year need of 15,143 dwellings to meet projected population growth. This averages out at 757 new dwellings a year. The Government currently sets out, through a standard

³² Population estimates – small area based by single year of age – England and Wales, 2019, Nomis:
<https://www.nomisweb.co.uk/>

³³ See: [201020bpitem9afinalhousingneedsineastdevonappendix 1orsaug2020.pdf](#)

national Government methodology, an annual average level of house building of 918 new homes per year. This level of house building clearly exceeds the 757 figure and some of it would provide for what the consultants refer to as 'pent-up' demand but also a small part, an annual average of around 80 homes a year, would effectively imply a moderate increase in net in-migration above the Office for National Statistics estimates. It remains to be seen what may happen to Government housing requirement figures.

Ethnicity and religion

- 3.77 Predominantly East Devon residents are from a white British background. The 2011 census shows that just 1.59% of the district's population is from an ethnic background, this is a slight increase on the 2001 census at which 0.74% of the population were from an ethnic background. This is very low by national standards with the England and Wales average standing at 14.03% but is in common with the other districts in Devon.
- 3.78 Christianity is the largest religion practiced in East Devon at 65.6% of residents being adherents (86,934). The largest non-Christian religion practiced in East Devon is Buddhism with 351 adherents. 10,796 people (8.2% of the population) said that they followed no religion at the 2011 Census.

Housing and its affordability

- 3.79 There are a total of 70,175 dwellings in East Devon, of which 6,746 are considered to be affordable.³⁴ This proportion of affordable dwellings (9.6%) is lower than both the county (11%) and national (17.2%) average.
- 3.80 The latest available data on tenure types of homes occupied by East Devon resident's dates back to the 2011 census, see ORS report. This showed that around 76% of households in the District either owned their home outright or were in the process of buying it. The proportion of households owning or buying their home has fallen slightly in recent years. The proportion of household in social rented housing has also fallen in recent years, down from 11% in 1991, to 10% in 2001 and to 9% in 2011. In contrast the proportion of households in the private rented sector has seen a marked increase, 11% in 1991 up to 12% in 2001 and 15% in 2011. It should be noted that the above information reflects a percentage split of total housing, actual numbers of households in owner occupied and private rent have increased, in contrast, and since the 1980's, those in social rent have gone down.
- 3.81 Whilst it is still a minority part of the overall market there has been a clear and growing trend of increasing numbers and an increasing proportion of households living in private rented sector housing. As the cost of buying a house has increased, and specifically so has the ratio of income levels to house prices, and as fewer affordable houses are being built, people are increasingly turning to private rented sector housing to meet their needs. This East Devon pattern of occupation is consistent with the national trend and in their report ORS advise that the CLG forecast that the private rented sector could

³⁴ Number of dwellings by tenure and district, England, 2019, Table 100: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Affordable dwellings in this context are local authority owned, private registered provider, and other public sector.

increase in size to 35% of households nationally by 2032. A continued pattern of increasing private sector renting of housing may therefore be seen in East Devon in the future.

Housing costs in East Devon

3.82 Drawing on 2019 data³⁵ the average house price in East Devon is £275,000, which is 10.47 times average earnings. This makes East Devon a less affordable place to buy a house than both the England (7.83) and south west region (8.79) averages. The following graphs show average house prices in East Devon since 1997, along with the affordability ratio that compares house prices to earnings. These indicate that house prices trebled between 1997 and 2007, but were then broadly stable until a rise in 2017-18. The affordability ratio doubled from 5 to 10 between 1997 and the mid-2000s, and house prices have remained around 10 times earnings ever since. In line with the national picture the comparative cost of buying a house, the income to house price ratio, has risen significantly over recent years. In simple terms house prices have gone up but wage levels have not followed in the same way. It is worth noting that house prices vary across East Devon – for example houses in the coastal towns, specifically Sidmouth and Budleigh Salterton, are typically more expensive than elsewhere.

Figure 3.10: Average house price in East Devon 1997 – 2019

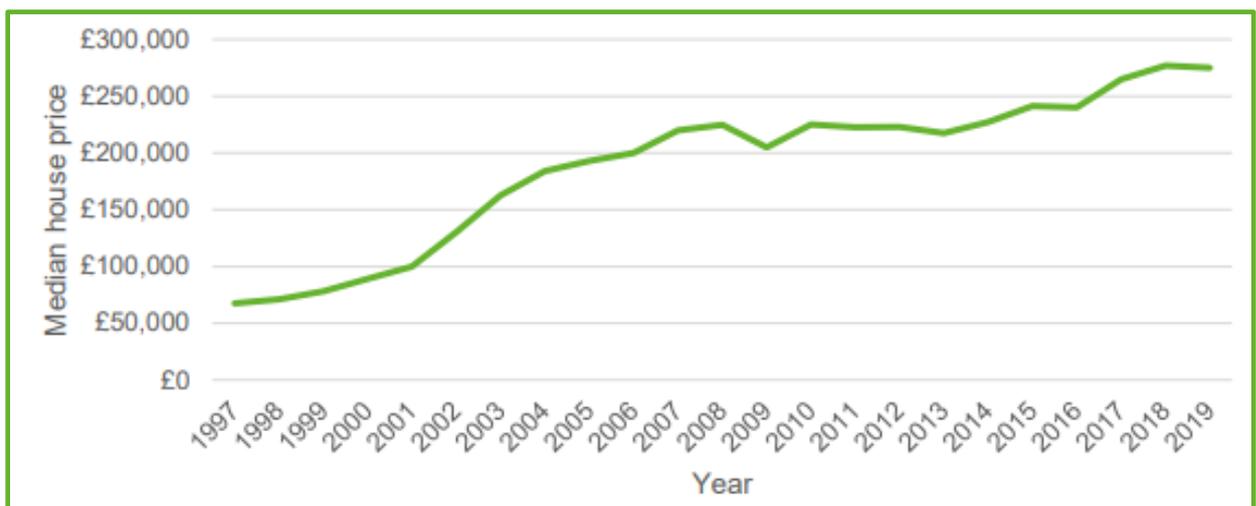


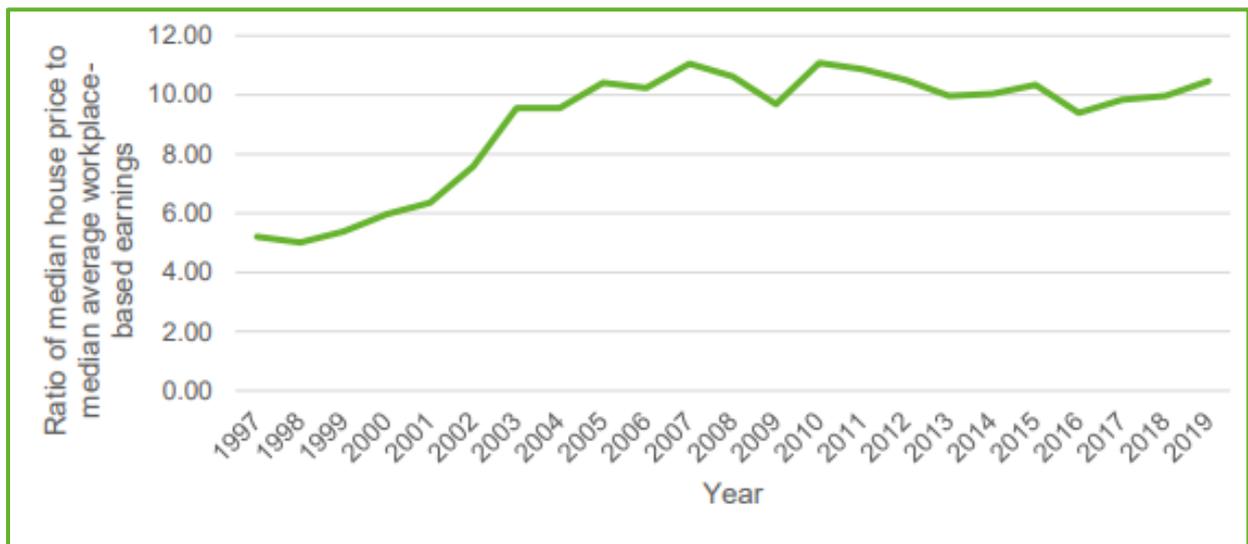
Figure 3.11: Affordability ratio in East Devon 1997 – 2019³⁶

³⁵ See:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2019>

³⁶ See:

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2019>



3.83 Private renting prices are also understood to have increased over recent years though social rent costs are less volatile and will not have seen such significant changes. However, social housing forms just a part of the affordable housing sector and whilst there are still a large number of social rent properties in East Devon, specifically in the form of a retained Council Housing stock, they are largely a product of 20th century development. Many recent additions to the affordable housing stock are not in the social rent sector and are typically more expensive to occupy.

3.84 The latest housing monitoring report for East Devon³⁷ reports on a local plan objectively assessed housing need to build an average of 950 homes per year from 2013 to 2031 (that is 17,100 over 18 years). From 2013 to 2020 there were 6,470 new homes built, an average of 924 per year. Over the next five years the annual average build rate is predicted to be 1,186 per year and over the full duration of the local plan there is a current (as at 1 April 2020) projected delivery of 18,415 new homes.

The health of the East Devon population

3.85 At just over 82.6 years old the life expectancy for residents in East Devon is very high with the area ranking in the top 10% of districts nationally and is top of all the Devon districts.³⁸ The ward with the highest average life expectancy is Yarty at 85 years and the lowest is Trinity at 77 Years old.³⁹

3.86 The proportion of the working age who are economically inactive due to suffering from long-term sickness is about the national average at 2.29% of the working age population. The national average is 2.29%, although the Devon average is 1.25% which is low by national standards.⁴⁰

³⁷ See: <https://eastdevon.gov.uk/planning/planning-policy/monitoring/>

³⁸ Office for National Statistics: Life expectancy at birth 2012-14

³⁹ Office for National Statistics: Life expectancy at birth 1999-2003 Ward Level

⁴⁰ Office for National Statistics: Annual Population Survey 2018

3.87 At the 2011 census residents were asked what their general health had been like in the past 12 months. In East Devon 79.81% of residents said that they were in good or very good health. This is below the national average of 81.19% and one of the lowest of the Devon districts. The figure in the 2011 census was a rise from the 2001 census when 67.1% of residents said they were in good health, with 24.2% in fairly good health and 8.7% whose health was not good.⁴¹

Figure 3.12: Health of the resident population - self reporting 2011⁴²

| | Good Health: good (pop.) | Good Health: fairly (pop.) | Good Health: not good (pop.) |
|-------------------|-----------------------------|-------------------------------|---------------------------------|
| East Devon | 79.81 | 15.07 | 11.68 |
| Exeter | 83.28 | 11.95 | 9.57 |
| Mid Devon | 82.08 | 13.37 | 9.75 |
| North Devon | 80.23 | 14.16 | 12.1 |
| South Hams | 81.78 | 13.32 | 10.34 |
| Teignbridge | 79.83 | 14.68 | 12.22 |
| Torridge | 78.37 | 15.42 | 14.28 |
| West Devon | 80.58 | 14.28 | 11.21 |
| National Average | 81.19 | 13.2 | 11.9 |

3.88 The East Devon Public Health Implementation Plan 2018/19 sets out the areas of health and wellbeing where the greatest impact can be made on the health inequality of the Devon population and the actions being taken to tackle them. The priorities within the Public Health Implementation Plan are:

- Improving the wider determinants of health
- Health Improvement
- Health protection
- Healthcare public health and preventing premature mortality.

Deprivation

3.89 The Index of Multiple Deprivation (IMD) is based upon seven domains of deprivation: income, employment, health and disability, education skills and training, barriers to housing and services, living environment and crime. These are weighted and combined to create the overall IMD. Overall levels of deprivation in East Devon are low, with the district ranking 238th out of 317 local authorities in England (where 1st is the most deprived, and 317th is least deprived). However, parts of Exmouth and Honiton are in the most deprived 30-40% overall in the country, and some rural areas (particularly in the Blackdown Hills) are among the most deprived for access to services in the country.⁴³ The following table shows the most deprived parts of East Devon, by local super output area (LSOA).

⁴¹ Office for National Statistics: Census 2011

⁴² Office for National Statistics: Census 2011

⁴³ English Indices of Deprivation 2019: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Figure 3.2: The top 10 most deprived LSOAs in East Devon, 2019⁴⁴

| Rank | LSOA Name | Ward | National Rank (1 is most deprived, 32,844 least deprived) |
|------|-----------------|----------------------------|--|
| 1 | East Devon 020C | Exmouth Littleham | 6,745 |
| 2 | East Devon 018C | Exmouth Withycombe Raleigh | 10,143 |
| 3 | East Devon 002A | Honiton St Michael`s | 11,056 |
| 4 | East Devon 002B | Honiton St Paul`s | 11,603 |
| 5 | East Devon 019A | Exmouth Town | 11,616 |
| 6 | East Devon 019C | Exmouth Town | 11,927 |
| 7 | East Devon 019D | Exmouth Town | 12,577 |
| 8 | East Devon 005B | Axminster Town | 13,255 |
| 9 | East Devon 009B | Coly Valley | 14,049 |
| 10 | East Devon 005A | Yarty | 14,799 |

Wellbeing in East Devon

3.90 Wellbeing can be looked upon as the quality and happiness of life that people enjoy. Key determinants of wellbeing are general health as well levels of mental and physical activity and access to stimulating and attractive environments. Good jobs, housing and general safety also all feed into wellbeing. Many of these wider wellbeing considerations are addressed elsewhere in tis appraisal.

Air quality and Air quality

3.91 The quality of the air we breathe, and the pollutants it may contain, can have fundamental impacts on human health, wellbeing and also wider environmental impacts and implications.

3.92 The main pollutant of concern in East Devon is Nitrogen Dioxide (NO₂) arising from road traffic around the busier and more congested areas. East Devon District Council had fifty four passive monitoring sites monitored NO₂ concentrations across the District in 2018, as well as the Honiton Urban Background automatic monitoring site.

3.93 Air quality across the District is of a high overall standard; with only two exceedances in the most recent reporting year, with both being below the exceedance limit after distance correction. Monitoring results from the more populous towns such as Honiton and Axminster were slightly elevated compared to other areas.

⁴⁴ English Indices of Deprivation 2019 explorer: [Indices of Deprivation 2015 and 2019 \(communities.gov.uk\)](https://www.communities.gov.uk/indices-of-deprivation)

3.94 Historically there was one Air Quality Management Area (AQMA) declared in East Devon which was revoked in April 2018 as a result of improvement in air quality in the designated area as well as the preparation of a detailed air quality report that found no exceedances observed at sensitive receptor locations.

Noise

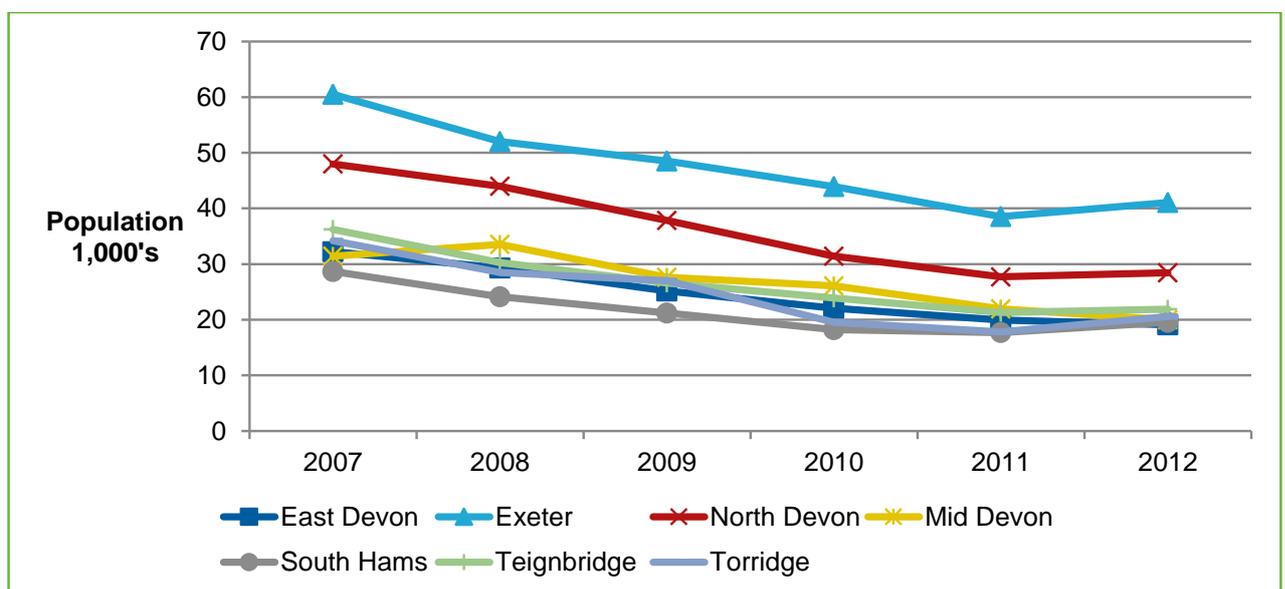
3.95 Noise pollution can also have a detrimental impact on levels of wellbeing. Urban areas tend to be noisier than rural areas though it is vehicle and traffic noise that typically generates the greatest levels of noise pollution and dwellings and other noise sensitive land uses near to main roads can see significant detrimental noise impacts.

3.96 Exeter International airport, in the western part of the District, also generates high noise levels from aircraft movements as well as engine testing and there are particular restrictions to development that apply close to the airport, these have, for example, constrained options for Cranbrook new town development.

Crime

3.97 East Devon has one of the lowest crime rate in Britain with 19.1 offences per 1,000 residents in 2012. By comparison the Devon figure 27.49 and the national figure was 37.63 offences per 1,000 residents.⁴⁵

Figure 3.3: Recorded crime per 1,000 population 2007-2012¹⁴



3.98 The levels of recorded crime in East Devon have fallen over the 6 years from 2007-12, following a similar pattern to the rest of the Devon districts. East Devon has very low rates of crime for dwelling burglaries, vehicle crimes and violent crimes making East Devon one of the safest districts to live in, in

⁴⁵ Office for National Statistics: Recorded Crime 2012

one of the safest counties to live. However, there does remain a fear of crime that can be a significant concern and it will also be the case that there are localised areas where crime rates are much higher than general District wide levels.

Figure 3.4: Crime rates by crime types 2012⁴⁶

| | Burglaries (per 1000 pop.) | vehicle crimes (per 1000 vehicles) | violent crimes (per 1000 pop.) |
|-------------------|-------------------------------|---------------------------------------|-----------------------------------|
| East Devon | 1.43 | 5.23 | 8.6 |
| Exeter | 3.6 | 15.63 | 18.77 |
| Mid Devon | 1.87 | 4.51 | 8.49 |
| North Devon | 1.81 | 7.37 | 14.43 |
| South Hams | 1.66 | 5.85 | 7.27 |
| Teignbridge | 1.44 | 6.33 | 9.83 |
| Torridge | 1.5 | 4.69 | 11.23 |
| West Devon | 1.15 | 3.56 | 7.41 |
| Devon | 1.85 | 7.69 | 9.6 |
| National Average | 4.44 | 16.38 | 13.57 |

Access to and availability of facilities and services

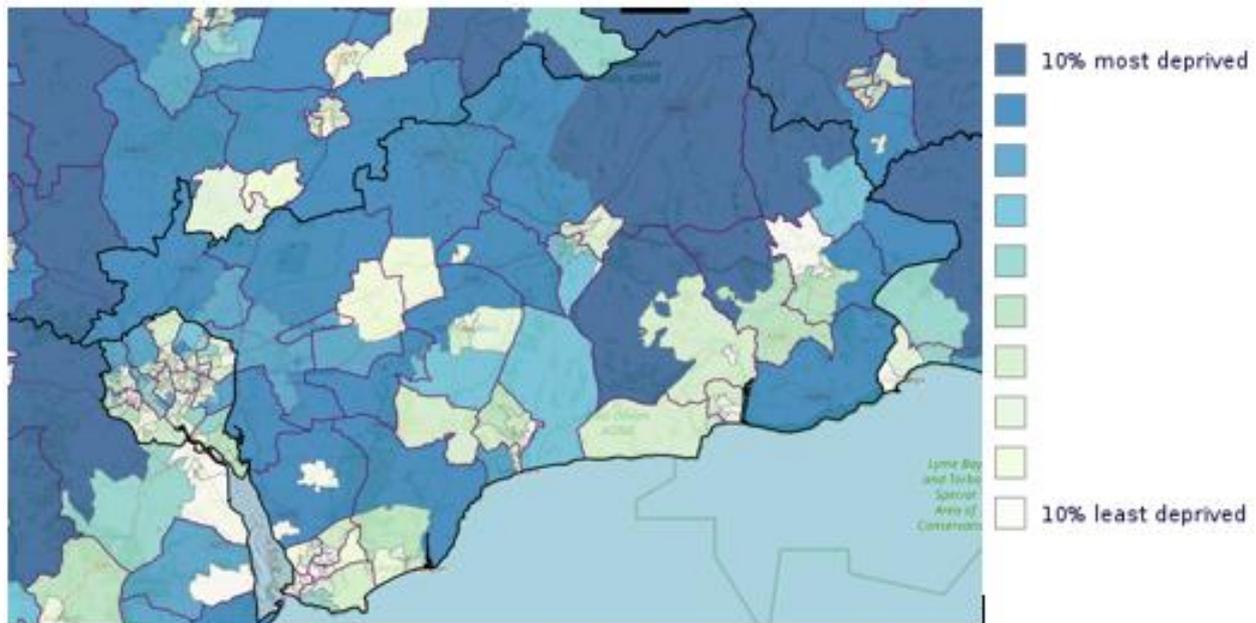
Access to facilities and services

3.99 The ability to be able to readily access services and facilities is of great importance in achieving sustainable development. Access to community facilities and services in East Devon varies significantly, with relatively wide range of facilities in the larger settlements, but poorer access in the more rural areas, as shown on the map below.

Figure 3.16: Access to Housing and Services in East Devon (outlined in black)⁴⁷

⁴⁶ Office for National Statistics: Recorded Crime 2012

⁴⁷ Barriers to Housing & Services Domain, English Indices of Multiple Deprivation 2019:
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>



- 3.100 Evidence⁴⁸ on the availability of community facilities and services in East Devon is broken down by ‘strategic’ and ‘local’ facilities, as follows:
- Strategic – supermarket, secondary school, library, hospital, leisure centre, swimming pool, emergency services facility, train station, hourly bus service
 - Local – convenience store, post office, primary school, pub, GP, community hall, allotment, children’s play area, less than hourly bus service, sports playing pitch.
- 3.101 Only Exmouth, Honiton, and Axminster are home to all of the community facilities and services. Sidmouth, Seaton, and Ottery St Mary also benefit from a wide range of facilities and services, deficient in only 1-3 strategic facilities (although the number of shops in Ottery is notably lower). Cranbrook is currently missing most strategic facilities, but there are plans for a supermarket, leisure centre, swimming pool, and emergency services facility, which means that in a few years’ time it will only lack a hospital. These seven places all play an important role in providing services and facilities for a large number of people across the settlement and wider rural area. The number of primary schools, shops, and GP surgeries in Exmouth distinguishes it from the other settlements.
- 3.102 Budleigh Salterton, Colyton, Broadclyst, and Lypstone all have two or three strategic facilities, along with at least 10 of the 11 local facilities, so play a wider than local role. Below this, with two exceptions (Exton, Colyford) the remaining settlements have just one strategic facility (train station or hourly bus service in nearly all cases), with several having no strategic facilities at all. 22 further settlements have at least seven local facilities and therefore play a local role for both the settlement and immediate surrounding area in meeting the basic needs for residents on a day-to-day basis.

⁴⁸ The Role and Function of Settlements, FINAL DRAFT, October 2021: [1a. Role and Function of Settlements_report_v3 final draft for SPC.pdf \(eastdevon.gov.uk\)](#)

3.103 All of the larger settlements have access to superfast broadband speeds, with Cranbrook exceptionally having ultrafast broadband. Whilst the majority of smaller settlements have superfast broadband (and even ultrafast in the case of Upottery, Smallridge, and Westclyst), several have only standard broadband speeds making it more difficult to access internet services.⁴⁹

⁴⁹ Broadband speeds from the centre of the settlement, from Ofcom broadband coverage checker, accessed on 02.06.21: <https://checker.ofcom.org.uk/>

Key economic baseline data

Availability of and promoting jobs in East Devon

3.104 This section covers issues relating to economic aspects of East Devon - including economic performance, business and enterprise, labour market and skills and qualifications. By way of broad overview East Devon has low unemployment levels but wages are comparatively low and there are a comparatively high number of smaller employer organisations and businesses in the District. There are high out-commuting levels of residents, primarily travelling to jobs in the city of Exeter where wage levels are on average higher. East Devon has something of a divide between a number of bigger businesses and more technology based activities on the western fringes of East Devon, close to Exeter, and a more traditional business make-up across much of the rest of the District.

Skills and qualifications

3.105 The level of skills and qualifications in East Devon is relatively low. There are a higher proportion of people aged 16-64 with no qualifications (8.1%) in East Devon than both the regional (5%) and Great Britain (6.4%) average. Similarly, the proportion of East Devon residents with higher level qualifications (39.1%) is lower than both the regional (40.4%) and national (Great Britain) average (43.1%).⁵⁰

Income and earnings

3.106 Having a good income provides a measure of security and ability to buy goods and services to meet needs. Weekly earnings for East Devon residents (£593) are higher than the South West average (£577), but fall behind the figure for Great Britain as a whole (£613). The gap between East Devon and Great Britain for weekly earnings by place of work is higher (£575 compared to £613), indicating that the jobs available in East Devon are relatively low paid.⁵¹

3.107 With average income levels for people in employment falling below national averages it suggests a local economy that is under- performing. However, information on distribution of wages within East Devon is not available.

3.108 The average pension income for those paying tax in 2016/17 was £19,400 which is one of the highest pension incomes in Devon. The Devon average was £18,100 and the England average was £17,700. East Devon is in the top 20% of districts for pension income across England.⁵² This indicates a disparity between the wealth levels of the retired compared to the working population.

Figure 3.5: Average household and pension incomes 2016/17

| | Self-employment income | Employment income | Pension income | Total income |
|--|------------------------|-------------------|----------------|--------------|
|--|------------------------|-------------------|----------------|--------------|

⁵⁰ ONS annual population survey, 2020, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

⁵¹ Earnings by place of residence and Earnings by place of work, ONS annual survey of hours and earnings, 2021, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

⁵² HMRC

| East Devon | 16,700 | 23,700 | 19,400 | 29,300 |
|-------------|--------|--------|--------|--------|
| Exeter | 17,200 | 25,600 | 16,600 | 28,300 |
| Mid Devon | 17,400 | 24,200 | 17,300 | 29,500 |
| North Devon | 14,900 | 23,000 | 18,000 | 27,000 |
| South Hams | 17,300 | 25,600 | 19,500 | 32,100 |
| Teignbridge | 17,200 | 24,400 | 17,900 | 28,400 |
| Torridge | 14,200 | 24,000 | 16,400 | 25,900 |
| West Devon | 16,200 | 24,900 | 18,600 | 29,700 |
| Devon | 16,500 | 24,400 | 18,100 | 28,800 |
| England | 24,500 | 31,300 | 17,700 | 34,300 |

3.109 The Pension Credit raises the minimum income for people aged over 60 with disability, caring responsibilities or housing costs, the number receiving this per 1,000 of the population in East Devon is 87.65 this is very low by national standards (national average is 140.59) and is the lowest of all of the Devon districts. The wards with the highest number of claimants for pension credit are Exmouth Town at 344.8 per 1,000 and Exmouth Withycombe Raleigh at 284.8 per 1,000. The ward with the lowest claimant rate is Sidmouth Rural at 55.62 per 1,000.⁵³

3.110 Attendance allowance is also paid to those aged over 65 years and who require assistance with day to day care of themselves. The number receiving this per 1,000 of the population in East Devon is 128.46 which is below the national average of 130.51 but above the Devon and Cornwall figure of 124.12. The wards with the highest number of claimants for pension credit are Exmouth Littleham at 199.2 per 1,000 and Exmouth Town at 194.8 per 1,000. The ward with the lowest claimant rate is Whimble at 72.5 per 1,000.⁵⁴

3.111 Despite the lower than average wages in East Devon, it has a low claimant count of 2.5% of those people aged 16-64, compared to 3.2% across the South West, and 4.4% for Great Britain as a whole.⁵⁵

Economic Performance

3.112 Gross Value Added (GVA) is the value of goods and services produced by an area giving an indication of the productivity of that area. The level of GVA per person in East Devon is low but growing, with the area ranking in the bottom 40% of districts nationally. GVA per head in East Devon is £47,109, compared with £60,119 in Exeter and £55,658 nationally. The share of national GVA in East Devon is also low by national standards, with the area ranking in the bottom 40% of districts nationally. It accounted for 0.14% of all GVA in Great Britain, Exeter accounted for 0.24%.⁵⁶

3.113 Throughout the global economy, the critical structural trend is the growth of the knowledge economy which typically supports higher wages and more secure employment. Knowledge-based industries

⁵³ Department for Work and Pensions

⁵⁴ Department for Work and Pensions

⁵⁵ ONS Claimant count by sex and age, December 2021, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://nomisweb.co.uk)

⁵⁶ Office for National Statistics: GVA by NUTS 3 2014

include aerospace, electrical machinery manufacture, printing and publishing, and chemicals and energy, telecommunications, computing, research and development, finance and business services, and recreational and cultural services. These industrial groupings are based on European Commission and OECD definitions, where individual industries are classified as knowledge-based if graduates make up at least 25 per cent of their workforce. Knowledge intensive business in East Devon accounted for 11.51% of total employment in 2017. This is very low with East Devon in the bottom 20% of districts nationally. By comparison, the Exeter figure was 22.41%, and the national figure was 20.83%.⁵⁷ However the western edges of East Devon, close to the City of Exeter, are seeing increases in knowledge based employment opportunities.

- 3.114 Jobs in the services industry predominate in East Devon, with the proportion of those working in retail, accommodation and food services all higher in East Devon than at a regional or national level⁵⁸ – these jobs are often lower paid and part time. Construction is also an important sector; but manufacturing, information and communications, and finance and insurance are all less concentrated in East Devon.⁵⁹

Business and Enterprise

- 3.115 A dynamic local enterprise culture is vital for the long-term competitiveness and overall success of any local economy. The measures that Place Analytics uses to assess the extent of an enterprise culture is composed of the new business formation rate, business size, business turnover, business stock and the business survival rate.
- 3.116 The new business formation rate in East Devon is low compared with national figures, with the area ranking in the bottom 20% of districts nationally. In 2017 the business formation rate was 10.04% of all businesses, this is below the national rate of 13.15% but is one of the top for all the Devon districts just behind Exeter's 10.8% and Teignbridge at 10.42%.⁶⁰
- 3.117 Between 2010 and 2021, the total number of enterprises in East Devon grew from 5,680 to 6,550, a figure that has remained the same since 2019.⁶¹ The new business formation rate and the business stock change measures however do exclude very small businesses and the self-employed which in East Devon make up the vast majority of business types so growth in these areas is not shown.
- 3.118 In 2018 there were 7,295 VAT registered businesses (which includes the small businesses that might be excluded in the business stock figures) were listed in East Devon, the highest number of businesses of all the Devon districts including Exeter⁶². There has been a steady rise in the numbers of VAT registered businesses in East Devon with over 700 more businesses registered in 2018 than in 2012.

⁵⁷ Office for National Statistics: The Business Register and Employment Survey (BRES) 2017

⁵⁸ Employee jobs, 2019, Nomis.

⁵⁹ Greater Exeter Economic Development Needs Assessment, March 2017: [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk)

⁶⁰ Office for National Statistics: Inter Departmental Business Register (IDBR) 2017

⁶¹ UK Business counts (2021), Enterprises, Inter Departmental Business Register, ONS – accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk)

⁶² Office for National Statistics: UK business: activity, size and location 2018

Figure 3.18: Numbers of VAT registered businesses 2018⁶³

| | 2012 | 2018 |
|-------------|-------|-------|
| East Devon | 6,590 | 7,295 |
| Exeter | 5,045 | 5,680 |
| Mid Devon | 4,575 | 4,955 |
| North Devon | 5,295 | 5,710 |
| South Hams | 5,265 | 5,815 |
| Teignbridge | 5,820 | 6,545 |
| Torrige | 3,695 | 4,030 |
| West Devon | 3,320 | 3,540 |

3.119 East Devon has a high number of micro and small businesses as well as a high level of self-employment. The proportion of all businesses in East Devon that are classed as micro, with 9 or less employees is 85.5% this places the area in the top 30% of districts nationally for the number of micro businesses. The average business size is 6.39 employees which is below the Devon and Cornwall average of 8.13 and the national average of 9.89 employees.⁶⁴

3.120 The self-employment rate in East Devon is also very high by national standards, with the district ranking in the top 20% of districts nationally. In 2018, the self-employment rate was 20.58%, compared with 10.15% in Exeter and 10.16% nationally.⁶⁵

Figure 3.19: Business turnover (%) 2018 – by employee numbers in the business

| Location | Business Turnover: 0-49 (£000s) (%) | Business Turnover: 50-99 (£000s) (%) | Business Turnover: 100-249 (£000s) (%) | Business Turnover: 250-499 (£000s) (%) | Business Turnover: 500-99 (£000s) (%) | Business Turnover: 1,000-4,999 (£000s) (%) | Business Turnover: 5,000+ (£000s) (%) |
|-------------------|-------------------------------------|--------------------------------------|--|--|---------------------------------------|--|---------------------------------------|
| East Devon | 19.25 | 21.83 | 31.46 | 13.07 | 7.51 | 5.56 | 1.33 |
| Exeter | 14.13 | 20.58 | 31.06 | 13.76 | 8.77 | 8.77 | 2.92 |
| Mid Devon | 24.89 | 19.8 | 29.42 | 12.28 | 6.64 | 6.08 | 0.88 |
| North Devon | 21.24 | 20.12 | 31.71 | 13.31 | 7.11 | 5.28 | 1.22 |
| South Hams | 20.04 | 20.43 | 31.57 | 13.59 | 7.23 | 5.96 | 1.17 |
| Teignbridge | 19.29 | 20.42 | 32.06 | 13.38 | 6.6 | 6.52 | 1.74 |
| Torrige | 25.59 | 21.16 | 28.22 | 12.86 | 6.5 | 4.56 | 1.11 |
| West Devon | 26.58 | 20.25 | 29.43 | 12.97 | 6.33 | 3.8 | 0.63 |
| South west | 18.47 | 23.09 | 30.81 | 12.69 | 7.04 | 6.27 | 1.63 |
| National | 16.53 | 23.97 | 31.26 | 12.05 | 7.05 | 6.86 | 2.27 |

⁶³ Office for National Statistics: UK business: activity, size and location 2018

⁶⁴ Office for National Statistics: UK business: activity, size and location 2018

⁶⁵ Office for National Statistics: Annual Population Survey 2018

3.121 The business closure rate for 2017 stood at 9.28% for East Devon which is one of the lowest closure rates nationally with the national average being 12.59%.⁶⁶

Labour market

3.122 In terms of labour supply, East Devon has 78,500 residents of working age (16 – 64) which is the third lowest proportion of working age people (53.6%) of any local authority in the UK.⁶⁷ Of these working age people, a relatively high number (84.5%, equating to 65,000 people) are economically active (those who are either in employment or unemployed). Unemployment is low at 2.3% in East Devon, compared to 3.5% across the south west, and a national figure of 4.2%.⁶⁸

3.123 There are around 61,000 jobs in East Devon, and the ratio of total jobs to working age people (also known as jobs or employment density) across the district is 0.77. This ratio has risen from 0.72 in 2008, but remains below the average level in the South West (0.88) and Great Britain as a whole (0.84).⁶⁹

3.124 The population aged 65+ has seen a big rise of those who are economically active – in 2005 just 5% of the 65+ population were economically active, which has increased to 13% in 2018.⁷⁰

3.125 The proportion of people claiming out-of-work benefits in East Devon is lower at 2.5% than the South West (3.2%) and Great Britain (4.4%) average. Similarly, unemployment rates are slightly lower in East Devon (3.2%) than the South West (3.6%) and Great Britain (4.8%) average.⁷¹ As unemployment is low, from an employer perspective this can present problems in terms of available labour. Employers are struggling to recruit and retain and this is an issue for potential inward investors or growing existing local businesses.

3.126 A significant proportion of East Devon residents travel outside the district to work – 18,400 people (around 41% of the working population) commute elsewhere to work, whilst there is an inflow of 12,500 people coming to work in East Devon. Exeter is by far the most popular other district to work in with 11,430 East Devon residents commuting here, representing a quarter of all work trips.⁷² Significant numbers also travel to work in Mid Devon, West Dorset, South Somerset, Teignbridge, and Taunton Deane – the remaining five districts that adjoin East Devon.

Figure 3.20: Top inflow and Top outflow of commuters in East Devon⁷³

⁶⁶ Office for National Statistics: UK business: activity, size and location 2018

⁶⁷ Mid-2019 population estimates, ONS, published June 2020.

⁶⁸ Nomis, September 2020: <https://www.nomisweb.co.uk/reports/lmp/la/1946157358/report.aspx?#is>

⁶⁹ Jobs density, 2020, Nomis.

⁷⁰ Office for National Statistics: Annual Population Survey 2018

⁷¹ ONS claimant count, Dec 2021; Employment and unemployment (Oct 2020-Sep 2021), ONS annual population survey, accessed on Nomis: [Labour Market Profile - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](https://www.nomisweb.co.uk/labour-market-profile)

⁷² Table 1, Local Housing Needs Assessment for the Greater Exeter area, May 2020: <https://www.gesp.org.uk/evidence/>

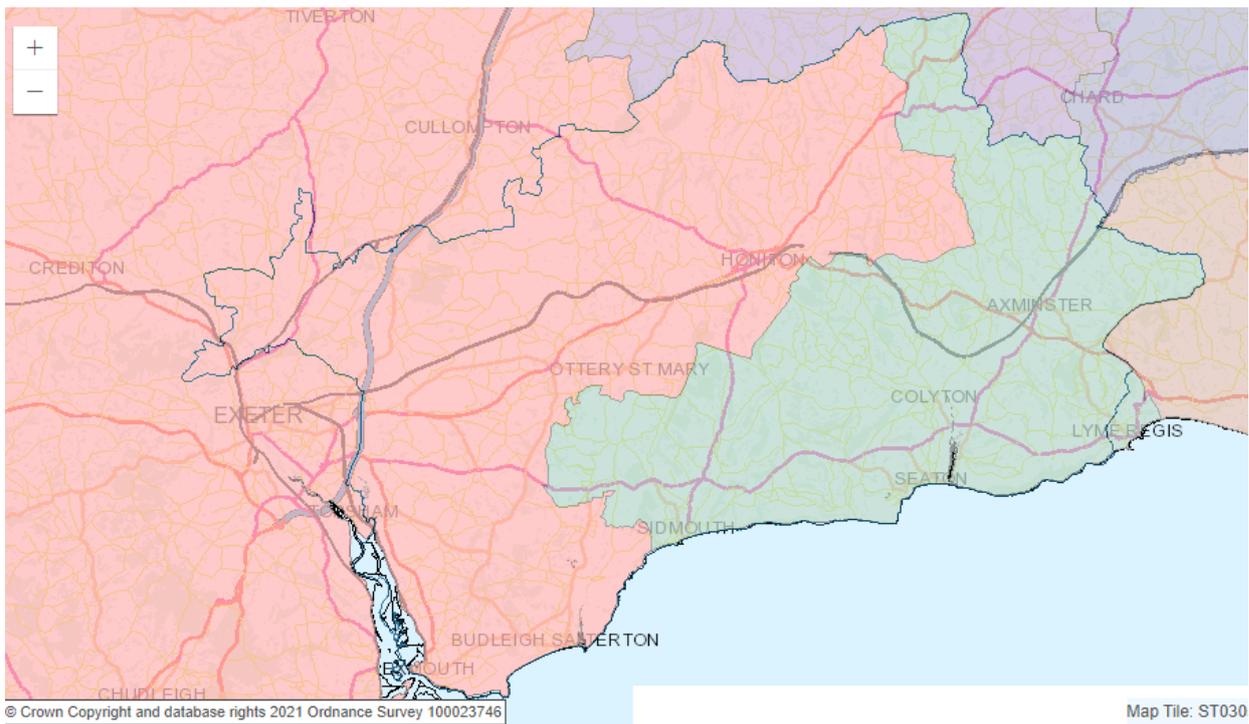
⁷³ Location of usual residence and place of work by method of travel to work, Census 2011. This diagram is taken from the Nomis website: <https://www.nomisweb.co.uk/census/2011/wu03uk/chart>



3.127 The influence of Exeter in employing East Devon residents is reflected in data on Travel to Work Areas (TTWAs).⁷⁴ Indeed, Exeter’s strong economic draw has seen its TTWA grow to be the second largest in the country. As shown in pink on the map below (figure 3.21), the Exeter TTWA extends far into East Devon, with the Sidmouth TTWA covering the south eastern part of the district.

Figure 3.21: Travel to Work Areas in East Devon

⁷⁴ TTWAs are defined by the Office for National Statistics (ONS) as “at least 75% of the area’s resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The area must also have an economically active population of at least 3,500”.



3.128 The average distance that East Devon residents travel to work is 18km, but a significant amount (18%) travel less than 2km.⁷⁵ The majority of journeys to work are made in a car/van, with 62% driving to work and a further 5% as a passenger. 13% of people walk to work, 3% get the bus, and 2% travel by train. 10% of workers in East Devon work mainly from home.⁷⁶ The Covid-19 pandemic has required many more people to work at home – it remains to be seen whether this trend continues in the long term.

The vitality and viability of town centres

3.129 East Devon currently has nine town centres and one village centre:

- Axminster;
- Budleigh Salterton;
- Colyton
- Cranbrook;
- Honiton;
- Ottery St Mary;
- Honiton;
- Seaton;
- Sidmouth; and

⁷⁵ Census 2011, QS702EW – Distance travelled to work, East Devon: [Data Viewer - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](#)

⁷⁶ Census 2011, QS701EW - Method of travel to work, East Devon: [Data Viewer - Nomis - Official Labour Market Statistics \(nomisweb.co.uk\)](#)

- Beer (village centre)

Each of these towns supports a town/village centre though at Cranbrook the centre is very embryonic in nature with limited facilities at present, but there are plans for new shops and facilities to be built. Colyton is the smallest of the East Devon towns and it has the least facilities of the centres listed. The village of Beer, although a bit smaller than Colyton, actually supports more shops with a number of these most likely to be viable on account of the tourist trade that Beer attracts.

- 3.130 With the exception of Cranbrook, and to some degree Colyton and Budleigh Salterton, the town centres of East Devon provide facilities to meet most of the needs of the resident populations of those towns and of surrounding rural hinterlands. A range of shops are found in these centres along with supermarkets and a diverse selection of social and community facilities. Independent shops are comparatively common in East Devon towns. For much larger sized shops and a bigger selection as well as major recreational and cultural venues and such destinations as major sporting facilities residents of East Devon would need to leave the District, with Exeter being the closest option.
- 3.131 From a commercial operational perspective the towns of East Devon generally perform reasonably well when compared to many other centres across England. There is, however, a net flow of retail expenditure out of East Devon to shops in a number of bigger centres. The bigger longer term threat to town centre vitality and viability comes, however, from on-line retailing. There have been significant increases in people buying goods online over recent years and the sales from this sector have increased markedly from March 2020 over the period of the Covid-19 pandemic.

Connectivity and transport in East Devon

Connectivity and transport

- 3.132 Connectivity addresses the issue of connecting people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon
- 3.133 East Devon accommodates a north-south running length of the M5 Motorway and Junctions 29 and 30 fall partly within the District. The A30, which runs east-west through East Devon forms the next most significant highway with around half of the District length, running into Exeter, being duelled. In terms of the main roads in East Devon, traffic has increased slightly on the M5 and A30 since 2005, but flows have remained relatively constant on the A375 and A3052⁷⁷.
- 3.134 Outside of East Devon, the main road links in into the city centre of Exeter can suffer from some peak time congestion which can affect those living and travelling into the City and backing-up congestion impacts do also occur on some short lengths of East Devon roads. Road congestion elsewhere in East Devon is, however, rare and limited in extent.

⁷⁷ Exeter Transport Strategy – Transport Empirical Data Report, Devon County Council, Jan 2019:
<https://www.gesp.org.uk/evidence/>

- 3.135 East Devon has a large number of train stations for its size (nine in total), across two lines, and usage has increased significantly over the last 20 years. The Exeter-London Waterloo line runs west to east, providing an hourly service at stations in the larger settlements. The other line (the Avocet line) has a half-hourly service from Exmouth to Exeter.
- 3.136 East Devon is also home to Exeter International Airport, which provides routes to a number of domestic and international locations.
- 3.137 Bus services in East Devon are of variable quality – within and between the main towns of the District, including links through to the City of Exeter, service frequency can be good. Many communities may be served by five or more buses a day. However in countryside locations (in practice this means the vast bulk of the land mass of the District) away from main through routes bus services can be poor or non-existent and even where they do exist may not be timetabled to allow for commuting for work or education purposes.
- 3.138 There are some high quality active travel (walking and cycling) corridors in East Devon, notably the Exe Estuary Trail and Clyst Valley Trail. The countryside of East Devon is accessible by a number of footpaths and the South West Coast Path runs along the entire length of the Districts coastline. Paths in towns are generally good.
- 3.139 A variety of projects are already in the pipeline to improve transport connections and support development across East Devon.⁷⁸ These include a passing loop for the train line near Cranbrook/Whimble to improve reliability and increase train frequency; a cycle path linking Cranbrook to Exeter; and the recently completed ‘park and change’ site at Exeter Science Park.
- 3.140 Road traffic collisions have fallen by a third across the Greater Exeter area over 10 years from 2006 to 2015. Roads in East Devon are generally safe, although the A375 Honiton High Street and link to Tesco Sidmouth Road is among the top five worst performing routes in the Greater Exeter area.⁷⁹

⁷⁸ East Devon Infrastructure Delivery Plan review, Nov 2017: https://eastdevon.gov.uk/media/2270747/idp-review-2017_report.pdf ; and Transport Infrastructure Plan, Devon County Council, March 2020: <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/>

⁷⁹ Exeter Transport Strategy, Transport Empirical Data report, January 2019 [https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FGreater Exeter Study - Transport Empirical Report%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence&p=true](https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FGreater%2FExeter%2FStudy%2FTransport%2FEmpirical%2FReport%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence&p=true)

4 Sustainability issues and problems

- 4.1 Setting out the policy context (chapter 2) and the baseline information (chapter 3) enables the identification of sustainability issues and problems relevant to planning policy in East Devon, as required in Schedule 1, 1 (c) and (d) of the SEA regulations (Stage A3).
- 4.2 The following table (figure 4.1) contains the key sustainability issues in the first column, and provides summary commentary in the second column. One of the tasks that needs to be undertaken in the SA work is a summary of the likely future trends in the absence of a new plan and relevant policy coverage. The final column provides a summary commentary and does so specifically in the context of possible outcomes of existing Local Plan policy becoming increasingly dated and of less relevance and therefore a scenario of an inability to effectively manage future development.
- 4.3 It should be noted that the concerns raised in the final column, in the absence of a local plan, could come about as a consequence of more speculative and ad-hoc planning applications that the Council may be less able to resist.

Figure 4.1: Key sustainability issues and problems, and likely future trends in the absence of a new Local Plan

| Sustainability issue | Summary commentary | Likely future trends in the absence of a new Local Plan |
|----------------------|---|---|
| Biodiversity | <p>Whilst East Devon has highly impressive biodiversity resources, they are under ongoing threats and there is an international recognition of the importance of protecting the natural world. Through the new local plan, specifically in respect of impacts that could arise from development, there is the scope to offer greater protection and through new legal requirements to secure biodiversity enhancements. Development can be directed to areas of lesser sensitivity and avoid areas of greater sensitivity.</p> | <p>Regardless of there being a new local plan there are still legal considerations that apply to protection of the higher ranking wildlife sites. However, these most important sites would not benefit from the comprehensive overview that a new local plan can provide. Sites of lesser importance may fair worse in the absence of a plan as may wildlife interest more generally without the controls that a plan and planning may put in place. The potential for biodiversity enhancement may also be lost or greatly prejudiced in the absence of a new local plan.</p> |
| Landscape, seascape | <p>With two thirds of the District falling in AONBs, and there being other important landscape assets, East Devon enjoys exceptional landscape qualities. A new local plan offers potential to afford these landscapes on-going protection whilst setting out policies to support sensitive and appropriate development. A new plan also offers scope for policy protection for local landscape features and areas that would not benefit from higher level statutory protection. East Devon's seascape is similarly exceptional, with the coast designated as a World Heritage Site, and offering tourism, maritime and recreation opportunities. Ongoing erosion and rising sea levels may threaten these opportunities going forwards.</p> | <p>National policy to protect the highest tier of landscape designation areas would remain in place and as such, for the AONB areas in particular, there would be national level protection. However, there is the danger that without local policy coverage there could be increased incremental damage and losses and lack of ability to take a strategic overview of concerns. Local landscape considerations may fair far less well under the absence of a new local plan as there would not be the means, or at least there would be much reduced means, to assess what is locally important and why and establish local controls. On the coast, the World Heritage Site and other heritage and biodiversity designations would limit development to an extent, but without a new Local Plan ad-hoc development may take place. The Local Plan can also identify Coastal Change Management Areas to restrict development where there are likely to be physical changes to the coast.</p> |

| Sustainability issue | Summary commentary | Likely future trends in the absence of a new Local Plan |
|-------------------------------------|--|--|
| Historic environment | <p>The historic environment of East Devon is important and varied. The buildings and structures of the District, and past human activities that have built them and helped shape the landscape, have defined much of the District we now live in. A new local plan adds specific scope to afford continued protection to all types of designated and non-designated heritage assets and their settings whilst offering potential for sympathetic reuse, for example through town centre regeneration.</p> | <p>The most important heritage features will continue to be afforded protection in the absence of a plan under national legislation and policy. However, the same may not apply to locally important features as the potential for local and more detailed policy guidance that a new local plan could deliver would be lost. Furthermore a new local plan may offer potential for taking an overarching strategic view of heritage considerations that would be lost in its absence and as such incremental negative impacts could occur whilst opportunity to use heritage as a positive driver for change, that a new local plan could promote, may also be lost.</p> |
| Quality of new development | <p>The quality of new development has a significant impact on how spaces and places perform and function, how they look and how well they serve residents and visitor's needs. However, quality standards vary greatly in new development but concerted policy effort in a new local plan can seek to improve greatly on some of the less good past developments. Improved design standards, in particular, are being promoted by Government including through its National Design Guide, and Model Design Code.</p> | <p>In the absence of strong policy promoting high quality development and design there is a very real risk that mediocrity (or worse) will be an accepted norm. Whilst high quality design is sought in national policy, without a local policy context there is a risk local distinctiveness and characteristics would not be promoted.</p> |
| Climate change and carbon emissions | <p>A changing warming climate is recognised as a fundamental challenge for the world. Adverse impacts will occur and will be worse in the absence of significant actions now. A new local plan provides the opportunities to promote high standards in building, support renewable energy generation projects and also to promote and identify locations for development in the most accessible locations where carbon dioxide emissions, for example from transport use, are lower.</p> | <p>The absence of a robust and rigorous policy would lessen the ability to promote the highest development standards and as such could lead to higher levels of carbon emissions from buildings and development, though this to some degree might depend on how quickly and to what ways the Government move in respect of changing minimum building standards. Perhaps of greater relevance, however, is the loss of ability to actively plan for renewable energy generation technologies and to plan spatially, what is built where and why, to promote patterns of development that lead to lower carbon dioxide emissions. Without a plan carbon emissions could be higher.</p> |

| Sustainability issue | Summary commentary | Likely future trends in the absence of a new Local Plan |
|-------------------------|--|---|
| Climate change adaption | With a warmer and wetter East Devon there will be a need to adapt to climate change. A new local plan provides scope to take into account flooding concerns as well as potential increasing patterns of land loss to the sea through coastal erosion. There will also be impacts on habitats and species that a new local plan can actively plan for and around through habitat creation and setting standards for new planting, | Flooding considerations, specifically at the planning application stage, can still be expected to be addressed on the strength of national policy. However a strategic approach to development in the realms of flooding and habitat planning may be lost or greatly eroded, as will opportunities to set local standards applicable and bespoke to East Devon, as opposed to national standards that could lack local relevance. |
| Land resources | Land resources (soil, minerals, previously developed land and waste) form a basis to support life and a new local plan can actively take account of these resources. Opportunities to minimise adverse impacts can be planned for whilst potential, for example in respect to building on previously developed land, can be realised through plan policy. | The absence of a new local plan would diminish the opportunities to take land resources into account. Possible impacts in the absence of a plan could include loss to development of higher quality agricultural land and development that does not appropriately utilise previously developed land. |
| Water quality | Water quality in East Devon is varied with some water courses, in particular, suffering from pollution that is detrimental to nature conservation objectives. A new plan provides the opportunity to restore and improve water quality outcomes and also to protect water supplies for domestic and other uses. | In the absence of a new plan it may be that it will not be possible, or at least not easy, to pro-actively plan for water quality improvements or it might be that it is not possible to accommodate development, building work may stop, on account of there not being acceptable means to secure mitigation. Likewise, scope to spatially plan for patterns of development that protect water supplies would not be possible, however, through national policy, at least on a case by case basis, impacts from specific developments would be taken into account. |

| Sustainability issue | Summary commentary | Likely future trends in the absence of a new Local Plan |
|----------------------|--|---|
| Homes | Having a decent home to live in should be seen as a fundamental need for all people. Critical considerations include, however, that differing people have differing needs and can have variable funds to pay for housing. Availability of affordable housing is a particular concern in East Devon. A local plan provides the means to establish policy designed around providing the right homes in the right places. | In the absence of a local plan there is far less control over the types of homes that may be built and where and of what type. Without robust policy in place the development industry is likely to build the types of homes, at the quantities that suits them, around the objective of maximising profits. This could well meet many consumers needs and wants but is unlikely to meet all, especially in respect of some specialist needs to include adapted houses and affordable homes. Development would be expected to carry on in the absence of a plan but it may be more likely to result from appeals or at least come forward in an unpredictable manner. |
| Health | Key planning concerns around health are centred on promoting the ability and opportunity for people to be able to be physically active and to enjoy high quality open space areas. Robust policy allows for relevant standards to be set. | The absence of a plan would reduce the scope to actively plan in a coordinated way for open space provision and to coordinate what is built with the best accessible existing provision. |
| Wellbeing | Generally people in East Devon live in a safe and healthy environment with limited levels of pollution. Crime levels are also comparatively low though there is a fear of crime. | In the absence of a plan it would be less possible to actively plan to minimise possible adverse impacts and if relevant to secure relevant mitigation. |
| Access to services | Generally speaking the towns of East Devon are well served with facilities, but peripheral parts of some East Devon towns may be some distance from key services. Service provision in villages is more sporadic and even more so in many rural areas. | Robust policy provides positive opportunities to plan for services and facilities alongside new development, especially housing development. The absence of a plan would provide less scope and less overview to ensure that services are accessible either through new provision alongside development or through directing development to locations that are already well served. A consequence of not having a plan could be a more ad-hoc pattern of development that may not be well related to or not served by facilities. |

| Sustainability issue | Summary commentary | Likely future trends in the absence of a new Local Plan |
|----------------------------|---|---|
| Jobs and employment | Having a job for individuals and securing better employment opportunities is likely to be key for a local plan to promote. Pre Covid East Devon had low unemployment levels but also low wage levels. There is an emerging high technology base in the western part of the District but lower skilled jobs, many seasonal in nature, are a prevalent characteristic of the District. | There will continue to be jobs and employment in East Devon in the absence of a plan. But not having a plan reduces scope to seek to identify appropriate sites and take other measures to support and encourage inward investment and business start-ups and expansions. As such an absence of a new local plan could reduce the scope to encourage more and better paid and more secure jobs. In a post Covid-19 world supporting new jobs in new emerging sectors could be very important. |
| Town centres | Town centres form a vital resource and area that support retail as well as social and wider commercial activities. They form a critical location to actively plan for where people congregate and come together. On-line retailing, with impacts exacerbated by Covid, however casts a fundamental challenge to future town centre vitality and viability. | In the absence of a plan, and active policy to promote town centre activity, opportunities may be lost to protect commercial premises, to plan for new ones and to promote activities that could encourage town centre vitality. This is not to say that town centre will cease to function in the absence of a plan, much of what happens in them is not plan dependent, but opportunities to be more proactive would be lost in the absence of a plan. |
| Connectivity and transport | The quality and availability of broadband connections and infrastructure for walking and cycling, and access to public transport in East Devon varies greatly. Public transport is of variable quality, generally reasonable or good in towns and on some through routes connecting urban together, within and beyond East Devon. However, in rural areas coverage can be patchy and in places poor or non-existent. East Devon has limited road congestion though routes into the City of Exeter can be busy and tailbacks do occur. | One of the key policy areas that a plan can address is to direct development to locations that are served by or can or will be served by good transport links and especially public transport. Other connectivity issues can, as well, be taken into account. In the absence of a plan there is the potential for a more ad-hoc pattern of development that does not, in a coordinated manner, plan for issues around connecting places in an efficient and effective manner. |

Areas of particular environmental importance

- 4.4 SEA regulations advise that the Environmental Report must include: “Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 74/409/EEC and 92/43/EEC” SEA Directive Requirement (Annex 1).
- 4.5 There are a number of European Sites, designated for their core breeding, feeding and resting habitats for rare and threatened species whose boundaries fall wholly or partly within a 20km radius of the East Devon boundary. European sites are the ‘top tier’ of protected nature conservation sites, and subject to strict legal protection. These sites comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites. They are afforded the highest level of protection and any development proposals within or affecting these must satisfy the requirements of the EU Directive on the Conservation of Wild Birds (74/409/EEC) and the EU Directive on the Conservation of Natural Habitats (92/43/EEC).
- 4.6 The baseline information presented in chapter 3, alongside the variety of existing environmental problems across the themes of biodiversity, landscape and seascape, historic environment, climate change, land resources, and water quality in figure 4.1, identify existing environmental problems. The problems that relate to areas of particular environmental importance are:⁸⁰
- River Axe SAC – classified by the EA as in “poor” status, for reasons including pollution from wastewater and in particular sewage discharge.
 - Beer Quarry and Caves SAC – potential loss of suitable foraging habitat, roost sites or connectivity.
 - Sidmouth to West Bay SAC – cliff vegetation may be vulnerable to changes in water quality, relating to poor water quality arising from agricultural run off or other human activity landwards of the cliffs; air pollution.
 - East Devon Pebblebed Heaths SAC – Recreation pressures from nearby development; water pollution; air pollution.
 - East Devon Pebblebeds SPA – Recreation pressures from nearby development; water pollution; air pollution.
 - Exe Estuary SPA and Ramsar – classified by the EA as “moderate”, with issues preventing waters reaching good status including pollution from towns, cities and transport. Also recreation pressures from nearby development.
- 4.7 The Council will be producing an assessment under the Habitat Regulations that will be considering these designated sites, threats upon them, and potential mitigation in greater detail.

⁸⁰ Initial Habitats Regulations Assessment Report, GESP – Draft policies and Site Options consultation, June 2020: [Draft Policies and Site Options \(Cancelled\) - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk)

5 Sustainability Appraisal Framework

5.1 By completing stages A1 – A3 we have developed an understanding of the key sustainability issues for the emerging East Devon Local Plan 2020-2040. The SA framework (Stage A4), shown in figure 5.1 below, identifies a series of sustainability objectives, derived from the earlier assessment. The second column contains key sustainability factors to consider within the objective. Finally, the third column reference is made to SEA topic matters covered. This provides the basis by which the sustainability effects of the East Devon Local Plan 2020-2040 will be described, evaluated and options compared.

Figure 5.1: Sustainability Appraisal framework

| Sustainability objective | Factors to consider | SEA Topics covered |
|---|---|---|
| <p>1. Biodiversity</p> <p>To conserve and enhance the habitat and wildlife of our natural environment.</p> | <ul style="list-style-type: none"> Natural habitats and biodiversity; flora and fauna Recreational and leisure opportunities compatible with conservation, and creation of multi-functional green infrastructure Ensure current, and potential future, habitat connectivity is not compromised Possible impact pathways between policy proposals and habitats and species impacted Deliver biodiversity net gain | <ul style="list-style-type: none"> Biodiversity, fauna, flora. Population/ human health (recreation). |
| <p>2. Landscape</p> <p>To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape</p> | <ul style="list-style-type: none"> Landscapes - including AONBs and landscape character. Coast. Seascape character | <ul style="list-style-type: none"> Landscape. Water (coast). |
| <p>3. Historic and built environment</p> <p>To conserve and enhance our heritage assets and promote high quality design and accessibility in new development</p> | <ul style="list-style-type: none"> Conservation of heritage assets World Heritage Site, Registered Parks and Gardens and locally listed heritage assets within their setting, including Listed Buildings, Conservation Areas, Archaeological sites, Scheduled Monuments, the World Heritage Site, Registered Parks and Gardens and locally listed heritage assets Sustain the historic environment and promote local character and distinctiveness by conserving and enhancing the significance of heritage assets and their settings and creating high quality new settlements, townscapes, developments, built environment and public realm. Concerns around heritage at risk. Public enjoyment of the historic environment | <ul style="list-style-type: none"> Cultural heritage. |

| Sustainability objective | Factors to consider | SEA Topics covered |
|--|--|--|
| <p>4. Climate change and carbon emissions</p> <p>To minimise greenhouse gas emissions.</p> | <ul style="list-style-type: none"> • Development that minimises the need to travel by providing access to public transport, cycle and walking links to help reduce use of private car. • Energy efficient developments and buildings, which make the best use of renewable and low carbon energy generation. • Multi-use green infrastructure which supports or creates transport networks. • Potential for more home working. | <ul style="list-style-type: none"> • Air. • Climatic factors. |
| <p>5. Climate change adaption</p> <p>To adapt to the possible effects of climate change.</p> | <ul style="list-style-type: none"> • Flood risk and the threat to people and property and coastal change and adaptation. • Heat, drought and extreme storms that will stress both the natural and built environments. | <ul style="list-style-type: none"> • Climatic factors. |
| <p>6. Land resources</p> <p>To utilise our land resources efficiently and minimise their loss or degradation.</p> | <ul style="list-style-type: none"> • Soil quality. • Avoid the loss of best and most versatile agricultural land • Safeguard mineral resources. • Reuse of previously developed land. • Contaminated land. • Minimise waste (reuse, recycle, recover). | <ul style="list-style-type: none"> • Soil. • Material assets (land, minerals). |
| <p>7. Water resources</p> <p>To utilise our water resources efficiently and minimise their loss or degradation.</p> | <ul style="list-style-type: none"> • Water quality and quantity. | <ul style="list-style-type: none"> • Water. |
| <p>8. Homes</p> <p>To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure to meet East Devon's needs.</p> | <ul style="list-style-type: none"> • Supply of housing (accommodating population growth and changes in household composition). • Housing mix (tenure and size). • Housing delivery and diversity of supply (e.g. Registered Provider affordable, volume builder and small builder open market, custom and self-build). • Housing affordability. | <ul style="list-style-type: none"> • Population. |

| Sustainability objective | Factors to consider | SEA Topics covered |
|---|--|--|
| <p>9. Health and well-being</p> <p>To support healthy, safe and active communities where people have access to attractive and functional recreation spaces</p> | <ul style="list-style-type: none"> • Cycle and walking networks. • Open space and green infrastructure in new developments and existing settlements. • Public recreational, play and leisure opportunities. • The quality and extent of existing green infrastructure assets that have a recreational function. • Social deprivation. • Air quality, noise and light pollution. • Safe and secure environment with reduced fear of crime. | <ul style="list-style-type: none"> • Population. • Human health. • Air |
| <p>10. Access to services</p> <p>To provide accessible and attractive services and community facilities for all ages and interests.</p> | <ul style="list-style-type: none"> • Access to area wide services (nursery and pre-school, primary, secondary, further and higher education; healthcare; etc.). • Community facilities (local shops, meeting venues, public houses, places of worship). • Cultural buildings and facilities (e.g. libraries, museums, cinemas). • Access to high speed broadband. | <ul style="list-style-type: none"> • Population. • Human health. |
| <p>11. Jobs and employment</p> <p>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity.</p> | <ul style="list-style-type: none"> • Employment land supply to cater for businesses of all sizes. • Mix of employment offer. • Productivity of local economy and access to labour supply. • Access to education and skills training. • Protect existing tourism businesses and offer. | <ul style="list-style-type: none"> • Population. • Material assets. |
| <p>12. Town centres</p> <p>To safeguard and strengthen the vitality and viability of town centres.</p> | <ul style="list-style-type: none"> • Diverse city and town centre economy. • Strengthen and safeguard the vitality and viability of centres. • Impact of new development on existing centres. • Access to existing centres. | <ul style="list-style-type: none"> • Population. |
| <p>13. Connectivity and transport</p> <p>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon.</p> | <ul style="list-style-type: none"> • Access to services – links between homes, services and businesses by active modes of transport (e.g. cycling and walking). • Access to public transport (e.g. distance to and frequency of bus and rail services). • Car reliance and use. • Access to local road network. • Impact on Strategic Road Network. • Reduction in congestion. | <ul style="list-style-type: none"> • Air. • Climatic factors. • Population/ material assets (in terms of benefits for economy). |

Using the SA framework for the Local Plan

- 5.2 In order to assess the sustainability of the Local Plan, a mechanism against which to assess potential impacts and implications is required. By applying this methodology to the assessment it will be possible to provide a snapshot of the relative sustainability of a policy or option and indeed compare them against one another.
- 5.3 For each objective, based on the likely performance of contributing factors, we will use the key shown in the table below (figure 5.2) to evaluate the SA effects. The assessment will provide summary comment on the factors affecting each objective. It should be noted that numbers below will not constitute numbers that can or should be applied in a mathematical manner, or in formulas, to be collectively added up or taken away to allow for comparative formulaic comparison of options. Rather they give an indication off the potential scale of impact that may arise for any scale of sustainability impacts for any specific objective.

Figure 5.2: SA significance key

| The policy/option/site is likely to have... | |
|---|---|
| ++ | a major positive impact overall in contributing towards the achievement of the objective. |
| + | a minor positive impact in contributing towards the achievement of the objective. |
| 0 | a negligible or no impact in contributing towards the achievement of the objective, or some positive and some negative impacts thus the balance overall is neutral. |
| - | a minor negative impact in contributing towards the achievement of the objective. |
| -- | a major negative impact in contributing towards the achievement of the objective. |
| ? | an uncertain effect in contributing towards the achievement of the objective. |
| + / - | a mixture of positive and negative effects in contributing towards the achievement of the objective. |

Using the SA framework to assess sites

- 5.4 The SA framework has been refined to make it more relevant and effective for the consideration of site options. Where possible, standards and thresholds have been added to each SA objective to better determine the nature and significance of effects. This should ensure that a consistent and comparative appraisal of reasonable site options is carried out.
- 5.5 The following table (figure 5.3) sets out how the SA framework will be applied to the assessment of sites, by providing significance criteria for each objective. These criteria should be considered alongside the factors included in figure 5.1.

Figure 5.3: Sites SA framework

| Sustainability objective | Significance criteria | |
|--|-----------------------|---|
| <p>1. Biodiversity</p> <p>To conserve and enhance the habitat and wildlife of our natural environment</p> <p><i>Evidence sources include: HELAA site assessments for proximity to wildlife sites; map of Strategic Nature Areas; Priority Habitats and Species in the Devon BAP; aerial imagery.</i></p> | ++ | Development at the site will deliver biodiversity gains, or improve ecological connections to strategic green infrastructure, or development will address a significant existing sustainability issue relating to biodiversity. |
| | + | Development will not lead to the loss of an important habitat or fragment ecological corridors identified as Strategic Nature Areas; and there are potential opportunities to enhance biodiversity. |
| | 0 | Development at the site is not likely to have positive or negative effects on any designated biodiversity site or sever green infrastructure. |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out. |
| | - | Development at the site has potential for negative effects on locally designated biodiversity sites, or sever ecological corridors identified as Strategic Nature Areas. |
| | -- | Development at the site has the potential for negative effects on an internationally or nationally designated biodiversity site. Mitigation likely to be difficult. |
| <p>2. Landscape</p> <p>To conserve and enhance the special qualities and distinctive character of our landscapes, undeveloped coast and seascape</p> <p><i>Evidence sources include: HELAA site assessments for proximity to AONB and comments on landscape impact; East Devon and Blackdown Hills Landscape Character Assessment (2019); aerial imagery.</i></p> | ++ | Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land (PDL) that is currently having a major negative effect on the landscape/seascape. |
| | + | Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/seascape, or the site has low landscape sensitivity. |
| | 0 | A neutral effect is not considered possible for this objective, given that development will have an impact upon the landscape (positive or negative). |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out. |
| | - | Site has medium sensitivity on landscape/seascape or is within the setting of the AONB or is located within a landscape that is identified in the East Devon and Blackdown Hills Landscape Character Assessment (2019) as vulnerable to the impacts of development. |
| | -- | Site has medium to high or high sensitivity in landscape/seascape terms and/or is within an AONB. Mitigation likely to be difficult. |
| <p>3. Historic and built environment</p> <p>To conserve and enhance our heritage assets and promote high quality design</p> | ++ | Development at the site has potential for a major positive effect on the significance of a designated heritage asset and/or its setting, including through promotion of public enjoyment of the site. Site will promote high quality design and accessibility. |
| | + | Development at the site has potential for minor positive effect as it secures appropriate new uses for unused |

| Sustainability objective | Significance criteria | |
|--|-----------------------|--|
| and accessibility in new development <i>Evidence sources include: HELAA site assessments for proximity to designated heritage assets and comment on impact; East Devon local list of heritage assets</i> | | heritage assets (particularly listed buildings), and/or enhance their setting. |
| | 0 | No significant effect because there are no heritage assets that would be affected by developing the site, or mitigation measures reduce negative effects to a residual neutral effect. |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out e.g. on the significance and sensitivity of heritage assets and their setting. |
| | - | Minor negative effects on a designated heritage asset or an important non-designated heritage asset and/or their setting. |
| | -- | Potential for a major negative effect on a designated heritage asset or an important non-designated heritage asset and/or their setting. Mitigation likely to be difficult. High quality design and accessibility is unlikely. |
| 4. Climate change and carbon emissions To minimise greenhouse gas emissions <i>Evidence sources include: HELAA site assessments for proximity to sustainable travel links; local studies on renewable and low carbon energy</i> | ++ | Site offers opportunities to significantly minimise greenhouse gas emissions by reducing the need to travel, having access to sustainable travel links, and use of renewable and low carbon energy. |
| | + | Site could minimise greenhouse gas emissions by offering potential to reduce travel, sustainable travel links, and use of renewable and low carbon energy. |
| | 0 | Site is well located to minimise greenhouse gas emissions from travel, but development could increase car travel. Limited opportunities to use renewable and low carbon energy. |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out. |
| | - | Development at the site is not likely to minimise the need to travel, with limited opportunities for sustainable travel and use of renewable and low carbon energy. |
| | -- | Development on site is likely to significantly increase greenhouse gas emissions as there are few opportunities to reduce travel or use sustainable travel modes. The use of renewable and low carbon energy is unlikely. Mitigation to address these matters is likely to be difficult. |
| 5. Climate change adaptation To adapt to the possible effects of climate change <i>Evidence sources include: HELAA site assessments for proximity to flood zones, surface water flooding, critical</i> | ++ | Site is not located in an area of flood risk from river, sea, or surface water or critical drainage area; and evidence that development at the site offers an opportunity to reduce flood risk. The built and natural environment can likely cope with heat, drought and extreme storms. |
| | + | Site is not located in an area of flood risk from river, sea, or surface water or critical drainage area. Potential for the built and natural environment to cope with heat, drought and extreme storms. |
| | 0 | Site is partially located in an area of flood risk, but development can avoid this area. Some effect from heat, |

| Sustainability objective | Significance criteria | |
|--|---|--|
| <p><i>drainage areas; aerial imagery.</i></p> | | drought and extreme storms, but can be mitigated to an acceptable degree. |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out. |
| | - | Site is partially located in an area of flood risk or critical drainage area, and development of the site would find it difficult to avoid these constraints. Difficult to mitigate the effects of heat, drought and extreme storms. |
| | -- | Site is wholly located in an area of flood risk and critical drainage area. Not likely to be possible to mitigate the effects of heat, drought and extreme storms. |
| <p>6. Land resources</p> <p>To utilise our land resources efficiently and minimise their loss or degradation</p> <p><i>Evidence sources include: HELAA site assessments for agricultural land classification, mineral safeguarding areas and contaminated land; aerial imagery.</i></p> | ++ | The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land, and/or development of the site will remediate contaminated land. Not within a mineral consultation area. |
| + | The majority of the site is brownfield and will not result in the loss of best and most versatile agricultural land. Not within a mineral consultation area. | |
| 0 | Not considered possible as development will always have some impact on a site (positive or negative). | |
| ? | Uncertain until more detailed lower level surveys and assessments have been carried out e.g. mixed uncertain if Grade 3 agricultural land is not broken down into 'a' and 'b'. | |
| - | The majority of the site is greenfield. The site is partially covered by best and most versatile agricultural land; and/or partially within a mineral consultation area; and/or partially located on contaminated land. | |
| -- | The site is wholly within best and most versatile agricultural land. Development also likely in a mineral consultation area and/or on contaminated land. | |
| <p>7. Water resources</p> <p>To utilise our water resources efficiently and minimise their loss or degradation</p> <p><i>Evidence sources include: HELAA site assessments for proximity to flood zones; proximity to River Exe; River Axe Nutrient Management Plan.</i></p> | ++ | Development at the site will lead to significant positive effects on water resources by using water efficiently and not affecting water quality. |
| + | Development will use water efficiently and not affect water quality, leading to a positive effect. | |
| 0 | Development at the site is unlikely to have any significant effects on water quality and quantity. | |
| ? | Uncertain until more detailed lower level surveys and assessments have been carried out. | |
| - | Developing at the site will mean minor negative effects on water quality and quantity. | |
| -- | Developing at the site will mean major negative effects on water quality and quantity. | |
| <p>8. Homes</p> <p>To provide and maintain a sufficient supply of good</p> | ++ | The site has the potential to provide a significant amount of new homes (100 dwellings or more), with an appropriate mix of tenures and sizes including affordable housing. |

| Sustainability objective | Significance criteria | |
|---|--|---|
| quality, financially accessible homes of mixed type and tenure to meet East Devon's needs. <i>Evidence sources include: HELAA; emerging Local Plan</i> | + | The site has the potential to provide new homes (less than 100 dwellings), with an appropriate mix of tenures and sizes including affordable housing. |
| | 0 | Neutral effect not considered possible as the site will either provide housing (positive) or not (negative). |
| | ? | Uncertain as the capacity of the site for new housing is not known. |
| | - | Not applicable when considering site options. |
| | -- | No housing is proposed as the site is being promoted for employment uses only. |
| 9. Health and well-being To support healthy, safe and active communities where people have access to attractive and functional recreation spaces <i>Evidence sources include: Indices of Multiple Deprivation; map showing transport network, heavy industry; Exeter Airport noise contours; aerial imagery. HELAA site assessments for proximity to open space/allotment and children's play area</i> | ++ | Will deliver new development in an area of higher deprivation (top 10 in East Devon), where there is good air quality and limited noise and light pollution (e.g. away from 'A' road, motorway, railway line, airport, heavy industry). The site is within 800m of open space/allotment and a children's play area. |
| | + | Will deliver new development in close proximity (400m) to an area of higher deprivation (top 10 in East Devon), where there is good air quality and limited noise and light pollution (e.g. away from 'A' road, motorway, railway line, airport, heavy industry). The site is within 1,600m of open space/allotment and a children's play area. |
| | 0 | Neutral effect not considered possible. |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out. |
| | - | Site is beyond 1,600m of open space/allotment and a children's play area; <u>or</u> developing the site would result in a net loss of existing open space/leisure facilities. Site is adjacent to an 'A' road, motorway or railway line. |
| | -- | Site is beyond 1,600m of open space/allotment and a children's play area; <u>and</u> developing the site would result in a net loss of existing open space/leisure facilities. Site is within area of 57db or higher from Exeter Airport. |
| 10. Access to services To provide accessible and attractive services and community facilities for all ages and interests. <i>Evidence sources include: HELAA site assessments for proximity to facilities;</i> | ++ | Site is within 800m of a primary school, secondary school, shop, and a GP surgery. |
| | + | Site is within 1,600m of a primary school, shop, and a GP surgery. |
| | 0 | Neutral effect not considered possible. |
| | ? | Uncertain until more detailed lower level surveys and assessments have been carried out. |
| | - | Site is beyond 1,600m of a primary school, shop, and a GP surgery. |
| -- | Site is beyond 1,600m of a primary school, shop, and a GP surgery. | |
| 11. Jobs and employment | ++ | The site is within 800m of an employment site; <u>and</u> has realistic potential to accommodate employment on site |

| Sustainability objective | Significance criteria | |
|--|-----------------------|--|
| <p>To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity.</p> <p><i>Evidence sources include: sites in Employment Land Review and Local Plan; aerial imagery</i></p> | | (e.g. larger site that has good access, acceptable landscape impact, and acceptable impact on amenity). |
| | + | The site is within 1,600m of an employment site; <u>and/or</u> has realistic potential to accommodate employment on site (e.g. larger site that has good access, acceptable landscape impact, and acceptable impact on amenity). |
| | 0 | Neutral effect not considered possible. |
| | ? | Uncertain as the capacity for new employment on site is not known. |
| | - | No employment sites are within 1,600m or likely to be delivered on site, but development offers employment opportunities during its construction. |
| | -- | Developing the site would result in a net loss of existing employment uses. |
| <p>12. Town centres</p> <p>To safeguard and strengthen the vitality and viability of town centres.</p> <p><i>Evidence sources: defined town centres in the Local Plan, Villages Plan, and 'made' neighbourhood plans.</i></p> | ++ | Site is located within 800m of an existing town centre. |
| | + | Site is within 1,600m of an existing town centre; or is of sufficient scale to provide its own town centre (4,000 homes plus). |
| | 0 | Neutral effect not considered possible. |
| | ? | Uncertain impact upon town centres until more detailed lower level surveys and assessments have been carried out. |
| | - | Site is beyond 1,600m of an existing town centre. |
| | -- | Not applicable. |
| <p>13. Connectivity and transport</p> <p>To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon.</p> <p><i>Evidence sources include: HELAA site assessments for proximity to train station and bus service; Ofcom broadband checker</i></p> | ++ | Site is located within 800m of a train station <u>and</u> an hourly or better bus service; and has superfast broadband (30mbps plus) as a minimum. |
| | + | Site is located within 1,600m of a train station <u>or</u> an hourly or better bus service; and has standard broadband (10-30 mbps) at least. |
| | 0 | Neutral effect not considered possible. |
| | ? | Unknown quality of connecting route to public transport, requires completion of lower level surveys and assessments. |
| | - | Site is located within 800m of a <u>less than hourly</u> bus service <u>and</u> train station; and has standard broadband (10-30 mbps) or less. |
| | -- | Site is located more than 800m from a <u>less than hourly</u> bus service <u>or</u> train station; and has standard broadband (10-30 mbps) or less. |

6 Consultation

- 6.1 We have consulted with the relevant bodies in preparing this report,⁸¹ including the prescribed consultation bodies of Environment Agency, Historic England, and Natural England. Consultation on the Draft SA Scoping Report took place from 18 January to 15 March 2021.
- 6.2 A total of 12 responses were received on the Scoping Report. Appendix B contains a summary of the consultation responses, and how they have been addressed by revising the Scoping Report. In brief, a range of amendments have been made to the Scoping Report as a result of consultation responses

⁸¹ Regulations 12(5) and 12(6), SEA Regulations: [The Environmental Assessment of Plans and Programmes Regulations 2004 \(legislation.gov.uk\)](#)

Appendix A – Relevant plans, policies and programmes

Figure A1: International plans, policies and programmes

| International plans/guidance | Implications for the Local Plan | Implications for SA |
|--|--|---|
| EU Directive 2001/42/EC (the SEA Directive) | A high level of environmental protection. To promote sustainable development by integrating environmental considerations into plan preparation and adoption; sets out detailed requirements of environmental assessment required for plans | The Directive has been translated into UK law and plan-making requirements and requires that a SA (incorporating SEA) is undertaken for all development plan documents. |
| Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (The Habitats Directive) | Promote the maintenance of biodiversity taking account of economic, social, and cultural requirements. Requires the Local Plan to be subject to Habitats Regulations Assessment to ensure potential negative environmental effects on European protected sites are identified and can be mitigated, and for site allocations and policies to take into account its findings. | Include objectives to protect and maintain the natural environment and important landscape features. |
| EU Ambient Air Quality Directive (2008/50/EC) & Directive 2004/107/EC | Limits & targets for pollutants in outdoor air set by the Air Quality (standards) Regulations 2010. | The SA framework sets objectives to minimise the adverse environmental, social and economic effects of air pollution through specific objectives. |
| EU Water Framework Directive (2000/60/EC) | It provides an opportunity to plan and deliver a better water environment, focusing on ecology. It provides an opportunity to plan and deliver a better water environment through river basin management planning. | The Directive highlights the need to protect ground and surface water from incidental, as well as accidental pollution. |
| EU Nitrates Directive | <p>Aims to protect water quality across Europe by:</p> <ul style="list-style-type: none"> • preventing nitrates from agricultural sources polluting ground and surface waters; and • promoting the use of good farming practices. <p>The Directive states that Nitrate Vulnerable Zones must be designated where nitrate pollution is found or appears likely, and an Action Plan produced to ensure that these areas are protected.</p> | Water pollution needs to be addressed through the SA Framework. |

| International plans/guidance | Implications for the Local Plan | Implications for SA |
|--|--|---|
| EU Directive (revised) on Bathing Water (2006/7/EC) | The overall objective is the protection of public health, but it also offers an opportunity to improve management practices at bathing waters. | Water pollution needs to be addressed through the SA Framework. |
| Drinking Water Directive (revision of technical annexes – II & III, (Oct 2015) | The amendments will provide an opportunity to monitor drinking water parameters at more appropriate frequencies. The new Annex II provides an option to perform the drinking water monitoring in around 100,000 water supply zones in Europe in a more flexible way, provided a risk assessment is performed ensuring full protection of public health. It follows the principle of ‘hazard analysis and critical control point’ (HACCP) used already in food legislation, and the water safety plan approach laid down in the WHO Guidelines for Drinking Water Quality. These amendments will allow a better and more problem-oriented monitoring of small water supplies. | SA Framework should consider water quality implications. |
| EU Directive on the Conservation of Wild Birds (Birds Directive – 2009/147/EC) | To protect all naturally occurring wild bird species and their habitats with particular protection of rare species. | SA Framework should consider objectives to protect and enhance biodiversity including wild birds. |
| EU Waste Framework Directive (2008/98/EC) | Sets the basic concepts and definitions related to waste management, such as definitions of waste, recycling, recovery. | The Framework requirements should be incorporated into the Sustainability Appraisal. |
| EU Directive on Landfill (1999/31/EC) | Focuses on waste minimisation and increasing levels of recycling and recovery. | Ensure the implications of this directive are met through the SA. |
| EU Environmental Noise Directive (2002/49/EC) | Concerns noise from the road, rail and air traffic and from industry; sets standards for noise emissions from specific sources. | Noise pollution needs to be addressed through the SA Framework. |

| International plans/guidance | Implications for the Local Plan | Implications for SA |
|---|--|--|
| EU Floods Directive (2007/60/EC) | Aims to reduce and manage risks that floods pose to human health, environment, cultural heritage & economic activity; requires assessment of all water courses for flood risk, map flood extent and assets & people at risk, and take adequate and co-ordinated measures to reduce flood risk. | The SA Framework will include objectives to ensure that flood risk/climate change has been taken account of. |
| EU Renewable Energy Directive (2009/28/EC) | Encourages energy efficiency consumption from renewable sources and improvement of energy supplies; places requirement on UK to source 15% energy needs from renewable sources by 2020. | The SA must contain an objective to promote renewable energy whenever this is possible. |
| EU Directive on Energy Performance of Buildings (2010) | The main objective of the Directive is to promote the improvement of the energy performance of buildings within the community, taking into account outdoor climatic and local conditions, as well as indoor climate requirements and cost effectiveness. | Energy matters need to be addressed through the SA Framework. |
| Ramsar Convention on Wetland of International Importance (1971) | Wetlands of international importance are designated as Ramsar Sites. Ramsar sites in England are protected as European sites. The majority are also classified as SPAs and all terrestrial Ramsar sites in England are notified as SSSIs. | Consider inclusion of objectives which aim to promote conservation and wise use of wetland areas. |
| European Landscape Convention (2000) | The first international convention with a specific focus on landscape, means that the Local Plan should include policies that promote the planning, management and protection of landscapes. | Include an objective to conserve and enhance the landscape. |
| UNESCO World Heritage Convention 1972 | Identify, protect, and conserve World Heritage properties – in East Devon this means the Jurassic Coast World Heritage Site, running along the southern coast of the district. | Conserve and enhance the historic environment. |

Figure A2: National plans, policies and programmes

| National Plans/Guidance | Implications for the Local Plan | Implications for SA |
|--|---|---|
| The Environment Act 2021 | Promote the conservation and enhancement of the natural environment in general. Reflect the requirement for 10% biodiversity net gain in new development; along with other long-term targets to be introduced by Government relating to air quality, water, biodiversity, resource efficiency and waste reduction. Have regard to the forthcoming local nature recovery strategy, to be produced at a county level. | Include sustainability objectives that promote the conservation and enhancement of the natural environment. |
| A Green Future: Our 25 Year Plan to Improve the Environment (HM Government, 2018) | Sets out Government action to tackle a wide range of environmental pressures. These include using and managing land sustainably, recovering nature and enhancing the beauty of landscape, connecting people with the environment, increasing resource efficiency and reducing pollution and waste. The Local Plan should include policies that promote conservation and enhancement of the natural environment, including through site allocations. | Include sustainability objectives that promote the conservation and enhancement of the natural environment. |
| Air Quality Strategy for England, Scotland, Wales and Northern Ireland – Vol 2 (DEFRA, 2011) | The Air Quality Strategy points to certain pollutants where national objectives are in some cases being met, and others not. Pollutants described include: lead, benzene, 1,3-butadiene, carbon monoxide, particulate matter, nitrogen dioxide, ozone, sulphur dioxide and polycyclic aromatic hydrocarbons. Levels for many of these emissions are closely related to transport use, which planning policies will need to consider means to reduce those reaching unacceptable levels. | Potential impacts on air quality, noise and light pollution and congestion. |
| Air Quality (Standards) Regulations 2010. | It sets air quality standards for key pollutants and requires the UK to demonstrate how the standards will be achieved and maintained when compliance is breached. Particular attention is given to reducing particulate matter, a pollutant associated with transport emissions, exposure to which can exacerbate existing respiratory conditions. | Consider sustainability objectives to reduce pollution and protect and improve air quality. |
| The Groundwater (Water Framework Directive) (England) Direction 2016 | This document sets out instructions on obligations to protect groundwater (water found below the surface). It updates requirements including: the monitoring and setting of thresholds for pollutants in groundwater; adding new pollutants to the list of pollutants to be monitored and changing the information to be reported to the European Commission. | The SA framework will include relevant objectives for water environment. |
| Natural Environment and Rural Communities Act 2006 | The act places a duty on public authorities to have regard to biodiversity as far as is consistent with the proper exercise of their functions. The act also requires the government to publish, review and revise lists of living organisms and types of habitats in England that are of principal importance for the purpose of conserving biodiversity. | Ensure the implications of this Act are met through the SA. |

| National Plans/Guidance | Implications for the Local Plan | Implications for SA |
|--|--|--|
| Countryside and Rights of Way Act 2000 | Places a duty on relevant authorities in exercising their functions, to have regard to the effect on land in an AONB, and to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. | SA objectives should seek to protect areas of landscape and wildlife importance. |
| Wildlife and Countryside Act 1981 | The act sets in place protective measures for wildlife, including wild birds and plants. The act requires local authorities to take steps to bring the protection of wildlife to the attention of the public and schoolchildren. The act (though subsequently amended) allows designation of Sites of Scientific Interest (SSSIs) setting their management and protection measures, and also allows the designation of national nature reserves. | The implications of this Act have to be met through the SA. |
| Climate Change Act 2008 (amended in 2019) | Act aims to improve carbon management and help the transition towards a low carbon economy. It sets out legally binding targets for greenhouse gas emission reductions through action in the UK and abroad to commit the UK to net zero emissions by 2050. | Take full account of the requirement to ensure greenhouse gases are reduced or minimised and that energy use comes increasingly from renewable sources. |
| Conservation of Habitats and Species Regulations 2010 (and Amendment 2012) | The regulations require land use plans that are likely to have a significant effect on a European site to make an appropriate assessment of the implications for the site in view of the site's conservation objectives. The local authority may only give effect to the land use plan after having ascertained that it will not adversely affect the integrity of the European site. | Relevant habitats need to be identified in the Sustainability Appraisal and appropriate assessment is required to ensure the protection of species and habitats. |
| England Biodiversity Strategy – Climate Change Adaptation Principles (DEFRA, 2011) | The principles include conserving existing biodiversity, conserving protected areas and all other high quality habitats, conserving the range and ecological variability of habitats and species, maintaining existing ecological networks, creating buffer zones and high quality habitats, understand change is inevitable, make space for the natural development of rivers and coasts and raise awareness of the benefits of the natural environment to society. | SA framework will include an objective relating to biodiversity and consider impacts on biodiversity in accordance with existing guidance. |
| DCLG: National Planning Policy for Waste (2014) | Sets out detailed waste planning policies for local authorities. The policy stresses the importance of close co-operation between waste planning authorities, encourages the use of heat as an energy source where energy from waste development is being considered. | The SA framework should consider objectives which relate to re-use, recycle and reduce. |

| National Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|---|---|
| Safeguarding Our Soils: A Strategy for England (DEFRA, 2011) | Soils perform valuable functions including nutrient cycling, water regulation, carbon storage, support for biodiversity and wildlife, and providing a platform for food and fibre production and infrastructure. Planning decisions must take sufficient account of soil quality, particularly when significant areas of the best and most versatile agricultural land are involved. The document also considers the need for local authority officers to make proportionate and robust decisions regarding the remediation of contaminated land. | The SA Framework should include an objective or guide relating to the effects of policies/proposals on soils. |
| National Character Areas (Natural England) | National Character Areas (NCAs) divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. | The SA will need to address landscape, geodiversity & economy considerations contained in the guide. |
| UK Renewable Energy Roadmap (DECC, 2013) | The UK has made very good progress against the 15% target introduced in the 2009 EU Renewable Energy Directive. This, alongside a healthy set of deployment pipelines, demonstrates the progress that is being made to decarbonise the economy and secure future electricity supply. | The Roadmap establishes a process of monitoring and evaluation that will enable the SA to be adjusted when appropriate. |
| Planning (Listed Buildings and Conservation Areas) Act 1990 | Includes special controls in respect of buildings and areas of special architectural or historic interest. The Local Plan should reflect the conservation of architectural and historic assets. | Include heritage and historic interest in SA objectives. |
| The Historic Environment in Local Plans (Historic England, July 2015) | Provides information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). | The SA/SEA should investigate if and how the historic environment can add social, economic and environmental value to people and communities. |
| The Historic Environment and Site Allocations in Local Plans (Historic England, 2015) | Follow this guidance when considering the impact of potential site allocations upon the historic environment | Conserve and enhance the historic environment when appraising site allocations and policies. |
| SA and SEA: Historic England Advice Note 8 (2016) | Contains advice on heritage considerations in the SA and SEA, and implementing historic environment legislation and policy. | Follow the guidance on how to consider heritage in the SA process. |

| National Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|--|---|
| Rural Statement (DEFRA, 2012) | Rural areas are home to one-fifth of the English population, and 28% of England's businesses. The key priorities include wanting rural businesses to make a sustainable contribution to national growth; engaging directly with rural communities; wanting rural people to have fair access to public services and be actively engaged in shaping the places in which they live. | Include the relevant priorities within the SA framework. |
| Planning policy for traveller sites (DCLG, August 2015) | Overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. There should be due regard to the protection of local amenity and local environment. | The aims of the document should be considered in policy making, which would help achieve the SA/SEA objectives |
| Lifetime neighbourhoods (DCLG, Dec 2011) | Guidance on the design of neighbourhoods to make them inclusive regardless of age or disability. The components that make up lifetime neighbourhoods include good access (enabling residents to get out and about in the area they live), services and amenities (neighbourhoods with a mix of residential, retail and employment uses and access to services including health, post office, banking facilities or cash machines). | The SA framework will need to formulate objectives that address the built environment and design of neighbourhoods. |
| Technical housing standards – nationally described space standard (DCLG, March 2015, & amends May 2016) | The nationally described space standard replaced the previous different space standards used by local authorities. It is not a building regulation and remains solely within the planning system as a new form of technical planning standard. | The standard highlights the need to consider levels of space for new development. |
| Decarbonising Transport – A Better, Greener Britain (Dept for Transport, 2021) | Reflect the pathway to net zero transport in the UK, highlighting the wider benefits that net zero can deliver. The commitments that should be reflected in the Local Plan include increasing cycling and walking, provision of electric car chargepoints, and car clubs. Walking, cycling or public transport should be the natural first choice for journeys. | Promote sustainable travel through the SA objectives. |
| Gear Change – A bold vision for cycling and walking (Dept for Transport, 2020) | Reflect the actions, grouped under four themes: better streets for cycling and people; cycling and walking at the heart of decision-making; empowering and encouraging local authorities; enabling people to cycle and protect them when they do. | Promote walking and cycling through the SA objectives. |
| Build Back Better: our plan for growth (HM Treasury, 2021) | Support infrastructure delivery, high-quality skills and training, and enable innovation. Specifically support net zero industries. | Include objectives to support economic growth. |

| National Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|---|--|
| National Infrastructure Delivery Plan 2016 to 2021 (HM Treasury, Infrastructure & Projects Authority, March 2016) | The Plan brings together the government’s plans for economic infrastructure with those to support delivery of housing and social infrastructure. Investment will lead to economic benefits of supporting growth and creating jobs and raising the productive capacity of the economy. | The delivery plan will help to inform the SA. |
| Localism Act 2011 | The aim is to devolve more decision making powers from central government to local communities. The act contains more rights for communities, including the community right to bid for assets of community value, community right to build, and neighbourhood planning. | Duty to co-operate in relation to planning of sustainable development. |
| National Planning Policy Framework (MHCLG, 2021) | <p>The Local Plan should be consistent with the NPPF, including through the delivery of the following objectives:</p> <ul style="list-style-type: none"> • An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; • A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and • An environmental objective - to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. | Ensure the SA reflects these national sustainability objectives, and the other policies in the NPPF. |
| Planning practice guidance (Dept for Levelling Up, Housing and Communities) | Refer to the guidance across the range of planning topics in preparing Local Plan policies and site allocations. | Reflect the range of sustainability issues that are addressed in the guidance. |

| National Plans/Guidance | Implications for the Local Plan | Implications for SA |
|--|---|---|
| National Design Guide and National Model Design Code (MHCLG, 2021) | Reflect the “guide” on how well-designed places that are beautiful, enduring and successful can be achieved in practice; and the “code” which provides detailed guidance on the production of design codes, guides and policies to promote successful design. | Ensure high quality design is reflected in the SA objectives. |
| Building for a Healthy Life (2020) | Design policies and site allocations policies should reflect this document, a design tool for creating places that are better for people and nature. | Ensure high quality design is reflected in the SA objectives. |

Figure A3: Local plans, policies and programmes

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|--|---|
| Council Plan 2021-23, East Devon District Council | Reflect the three priorities: 1) Better homes and communities for all 2) A greener East Devon and 3) A resilient economy. | Ensure the objectives cover the range of sustainability issues. |
| East Devon District Council Climate Change Strategy 2020 - 2025 | Carbon neutral development by 2040. Increase resilience to climate change. Enable reductions in greenhouse gas emissions from energy consumption in homes, transport and businesses. Support new development that minimises greenhouse gas emissions. Support supplies of renewable and low carbon energy. | Support mitigation and adaptation to climate change. |
| Water Resources Management Plan (South West Water, 2019) | Management Plan concludes that there is sufficient water supply up to the year 2045. It identifies that groundwater provides most of the water supply for East Devon. Local Plan should optimise the use of water resources in new development, ensuring they are resilient to future droughts due to climate change. This could include setting design standards for water usage in new dwellings. | Ensure water resources and climate change are included in objectives. |
| South West River Basin Management Plan (Environment Agency, Dec 2015) | Consider impact of future development upon water quality. | Include an objective relating to water quality. |
| Shoreline Management Plan (South Devon and Dorset Coastal Advisory Group, Dec 2010) | <p>The document is an assessment of shoreline and estuary processes. It outlines the approach to managing coastal change in the area. The objectives of SMPs are to:</p> <ul style="list-style-type: none"> • Improve our understanding of coastal processes. • Work in partnership with all interested organisations and the public. • Prepare a setting for the long term planning of coastal defences. • Set out a plan over a 50 year timescale. | The SA framework should consider impacts on coastal resources in the plan area. |
| Managing Flood and Coastal Erosion Risk for the Exe Estuary – Final Strategy (Environment Agency, May 2014) | <p>The Strategy has reviewed the policies that are set out in the South Devon and Dorset Shoreline Management Plan (SMP) and covers a 100 year period. Key components are:</p> <ul style="list-style-type: none"> ○ maintaining, improving and constructing new coastal defence schemes; ○ providing flood warning systems; ○ working with local authority planners to restrict development in flood risk areas; ○ encouraging the use of flood resilience measures for existing properties in flood risk areas. | The SA framework should consider impacts on coastal resources in the plan area, and consider objectives to ensure flood risk has been taken account of. |

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|---|---|
| The Nature of Devon – A Biodiversity and Geodiversity Action Plan (DCC, 2009) | Objectives of the action plan include ensuring that planning policies recognise the importance of biodiversity and the geological features of Devon, to ensure consideration is given to nature conservation issues in the implementation of planning. | SA framework should ensure, as far as possible, biodiversity is supported and protected. |
| Devon Landscape Character Assessment (Devon Landscape Policy Group) | Devon’s landscape character assessment describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Devon. It also set out strategies and guidelines for the protection, management and planning of the landscape. | SA framework should consider the impact on landscape. |
| Devon Landscape Policy Group Advice Note 2: Guidance on the siting, design & assessment of wind & solar PV developments in Devon (DCC, June 2013) | Balancing the need to support the transition to a low carbon future and the need for energy security with the management of Devon’s unique and valued landscape is a key challenge. The landscape is also a major contributor to a strong tourism industry. The conservation of special landscape character is a core principle of the NPPF. Devon has good conditions to produce wind and solar electricity, but it is important that the characteristics of Devon’s landscape are not unacceptably harmed by poor design or inappropriate siting of renewable or low carbon technologies. | The advice note highlights the need to harness renewable energy development opportunities in landscape context. |
| East Devon and Blackdown Hills Landscape Character Assessment (2019) | Consider the the rich diversity of landscapes in the area, with 17 landscape character types across East Devon, through policy writing and when allocating land for development. | SA framework should consider the impact on landscape. |
| Historic Seascape Characterisation South West Peninsula (English Heritage, Jan 2014) | The report allows an understanding of historic trends and processes to inform and frame the broader sustainable management of change through marine spatial planning, outreach and research projects. It is one of three projects commissioned to complete strategic-level HSC coverage of England’s coasts. | SA framework should consider the impact on marine environment. |
| Seascape Assessment for the South Marine Plan Areas – MCA 1: Lyme Bay (West) (MMO, 2014) | Reflect the seascape assessment when drafting policies and allocating sites for development. The assessment identifies the key characteristics in East Devon, including the historical interest of the cliffs, mudslides and landslips, and it being a popular tourist destination. It also identifies land with views of the sea. | SA framework should consider the impact on seascape. |

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|---|---|
| Heritage at Risk 2021 / South West (Historic England) | The Register provides an annual snapshot of historic sites known to be at risk from neglect, decay or inappropriate development. It records relevant listed buildings, places of worship, scheduled monuments, industrial sites, conservation areas, parks and gardens, protected wrecks and battlefields. | The SA should contain an objective for and consideration of the protection and enhancement of the historic environment. |
| East Devon Heritage Strategy 2019-2031 (East Devon District Council, 2019) | Reflect the baseline information relating to the historic environment in East Devon. Objectives include to positively manage heritage assets and to encourage development which enhances distinctiveness. | Reflect the heritage assets in East Devon to ensure the protection and enhancement of the historic environment. |
| East Devon Guide to the Listing of Local Heritage Assets, and the List (East Devon District Council, December 2020) | Ensure the local heritage assets that are identified on this list are reflected in Local Plan policies and when considering site allocations, as appropriate. | Reflect the local heritage assets in East Devon to ensure the protection and enhancement of the historic environment. |
| Jurassic Coast Partnership Plan 2020-2025 | Reflect the strategic aims to protect the site's World Heritage Status; conserve and enhance the Site and its setting. | Ensure appropriate protection is given to the Jurassic Coast World Heritage Site. |
| Devon Minerals Plan 2016 | The plan contains the Council's vision and objectives for minerals planning and policy framework and site proposals to maintain the supply of minerals and limit the impacts of their working. | The SA framework should consider recognised mineral areas and if possible avoid development of these areas. |
| Devon Waste Plan 2014 | There are six Objectives that identify how sustainable waste management will be achieved, including targets for recycling and energy recovery and measures for the provision of waste management capacity, addressing climate change, supporting communities and businesses, conserving and enhancing Devon's environment, and the transportation of waste. | SA framework should assess whether the Plan helps to minimise waste. |

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|---|---|
| Devon Education Infrastructure Plan (2016 – 2033) (DCC) | <p>The key aims of the plan are to provide:</p> <ul style="list-style-type: none"> • schools with a clear understanding of how decisions are reached about • pupil planning, estate maintenance processes and capital investment; • Local Planning Authorities and housing developers with an understanding • of their role in supporting the future pattern of education provision; • the wider community with an understanding of how education provision will • be delivered to support the development of Devon over the next 20 years; | SA should consider educational needs and identify any potential deficiencies. |
| Devon Partnership Gypsy and Traveller Accommodation Assessment Report 2015 (Devon Partnership of local & national park authorities) | The purpose of the assessment is to quantify the accommodation and housing related support needs of Gypsies and Travellers (including Travelling Showpeople) in terms of residential and transit/emergency sites, and bricks and mortar accommodation for the period 2014/15-2034/35. | The assessment will help to inform the SA. |
| Heart of the South West Local Enterprise Partnership (LEP) Business Plan | Objectives include promoting infrastructure to connect markets. Priorities include addressing existing and future constraints on business growth (emphasising the need for ongoing public and private investment to improve connections into and within the area where current connectivity is impacting on productivity and competitiveness), encouraging the roll out of future electronic communication technologies for the region, encourage a joined up approach to future housing development to secure economic prosperity (including social infrastructure and appropriate affordable housing), ensure an integrated approach to economic development recognising the constraints the planning system can place on business growth, particularly affecting rural businesses. | The business plan will help to inform the SA. |
| Heart of the South West LEP Strategic Economic Plan 2014 – 2030 | This approach has been translated into three core aims. Creating the conditions for growth by Infrastructure and services to underpin growth (transport infrastructure, broadband and mobile connectivity, skills infrastructure), Maximising Productivity and Employment by stimulating jobs and growth across the whole economy to benefit all sectors (including tourism, agriculture and food and drink) and Capitalising on our Distinctive Assets. | SA framework should reflect the main land-use planning related measures of the strategic economic plan. |

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|--|---|
| Heart of the South West LEP Local Industrial Strategy, November 2020 | The provision of infrastructure should support the delivery of housing and economic development. To improve transport networks, improve digital connectivity, accelerate housing delivery, and ensure there is sufficient employment land. | Infrastructure issues can be considered through several SA objectives such as providing access to community facilities and services, sustainable travel links, and open space |
| Local Transport Plan 3, Devon & Torbay Strategy 2011 – 2026 (DCC, 2011) and Implementation Plan (DCC, 2011) | <p>The plan has five key objectives:</p> <ul style="list-style-type: none"> • Deliver and support new development and economic growth • Make best use of the transport network and protect the existing transport asset by prioritising maintenance; • Work with communities to provide safe, sustainable and low carbon transport choices • Strengthen and improve the public transport network; • Make Devon the 'place to be naturally active <p>The Plan includes the specific scheme for the Dinan Way extension in Exmouth.</p> | SA should assess how the transport plan helps to deliver travel, transport and movement objectives. |
| Transport Infrastructure Plan (DCC, March 2015) | Complements the LTP, by proposing a range of transport schemes. Some of these have been delivered, but others should be considered in the Local Plan, including the Axminster relief road, Clyst St Mary roundabout, and the Clyst Valley Way. | Assess how the transport plan helps to deliver travel, transport and movement objectives |
| Cycling and Multi-Use Trail Network Strategy (DCC, 2015) | Reflect walking and cycling improvements as appropriate, including cycle links from Cranbrook to Exeter, Seaton to Colyton, and Feniton to Sidmouth. | Support walking and cycling. |
| Continuous Modular Strategic Planning – West of England Line Study 2020 (Network Rail) | Reflect the proposed railway passing loops at Axminster, Honiton, and Whimple to Cranbrook, as appropriate. | Support rail travel. |
| Devon Bus Services Improvement Plan (Devon County Council, 2021) | Reflect the aims/objectives as appropriate, which include to grow bus patronage, create a bus network that meets the needs of users, and increase bus priority to make it an attractive alternative to the car. Propose strategic bus links in East Devon are new services to the east of Exeter (including the Enterprise Zone), more direct Seaton to Exeter journeys, improved frequency from Honiton to Taunton, a new link between Honiton and Cullompton, along with better bus connections to rail services. | Support bus use. |

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
|---|---|---|
| State of Environment report (Devon Local Nature Partnership, updated 2018) | The report considers trends which point to the future condition of the environment, as well as identifying current and likely future pressures that need to be considered in decision making. Such issues as Accessibility and Recreation, Land Use, Water Environment & Geology and Soil are covered. | The environment report will help to inform the SA. |
| Devon Green Infrastructure Strategy (DCC, 2012) | Nine guiding principles promote a joined-up approach to planning and delivery of green infrastructure across local authority boundaries as part of sustainable development delivery. | The SA framework will consider relevant objectives for biodiversity and green infrastructure. |
| Clyst Valley Regional Park 25 Year Masterplan (EDDC, 2021) | Reflect the objectives of the Regional Park, including continuing to protect the area from inappropriate development, enhance health and well-being, achieve good ecological status in the River Clyst, and protect historic landscapes. | Reflect the range of sustainability objectives highlighted in the Masterplan. |
| River Axe Nutrient Management Plan (EDDC, 2020) | Ensure that housing development in the River Axe catchment can be delivered with no net increase in phosphate in the river, to protect its ecology. Include the series of measures necessary to achieve this. | Ensure water quality and biodiversity issues are considered, particularly in relation to the River Axe. |
| River Axe Restoration Plan (Environment Agency and Natural England, 2019) | Include policies that support the restoration and protection of the River Axe SAC and SSSI. | Ensure water quality and biodiversity issues are considered, particularly in relation to the River Axe. |
| Devon Local Flood Risk Management Strategy 2021-2027 (DCC, 2021) | This strategy should act as a first point of call to provide guidance on any flood risk management issues in Devon and sets out principles that will balance the needs of communities, the economy and the environment through partnership working, with effective and sustainable risk management and prioritisation. Priority communities in East Devon that will be considered for flood risk investigation and potential investment are Exmouth, Seaton, Budleigh Salterton, and Sidmouth, all due to surface water flooding. | The SA framework will consider objectives to ensure flood risk has been taken fully into account. |
| Western Power Distribution Business Plan (R110-ED1) 2015-2023. (April 2014) | WPD is a Distribution Network Operator (DNO) and distributes electricity to 7.8 million customers across the Midlands, South Wales and the South West. The greatest challenge to be faced is adaptation of networks and business processes to the demand for a low carbon environment. The plan has used a 'best view' of the scale of low carbon technology and its impact on the network as informed by independent analysis. Alternative scenarios have been modelled to provide a range of potential outcomes. | The WPD business plan will help to inform the SA. |

| Local Plans/Guidance | Implications for the Local Plan | Implications for SA |
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| Devon Rural Housing Enabler Business Plan 2014 -2018 (Devon RHE Team, April 2015) | <p>The main aims are to:</p> <ul style="list-style-type: none"> • Continue to support delivery of affordable rural housing through partnership working, • Support partners in responding to changing external environment and developing new and innovative methods of delivering affordable rural housing, • Continue to evidence the need and make the case for affordable rural housing, • Build a long-term sustainable RHE programme along socially enterprising lines. | SA should ensure affordable rural housing aims are taken into account. |
| East Devon Local Plan 2013-2031 | A vision for East Devon to: play its part in boosting the economy of the Exeter sub-region by encouraging significant growth within the West End of the district, provide for more balanced communities where homes and jobs are in better alignment by for example providing major employment, housing and community facilities in Exmouth. | SA/SEA of the Local Plan has been carried out. |
| East Devon Community Infrastructure Levy – Charging Schedule & Infrastructure List | East Devon DC is the Charging Authority for the East Devon Local Plan Area. The CIL raised will be spent within communities on improving and providing new infrastructure, as shown on the Infrastructure list – the latest list includes education projects, habitat mitigation, the Clyst Valley Regional Park, open space, and transport projects. | SA may consider the economic, social and environmental benefits or costs resulting from the CIL. |
| East Devon AONB Management Plan 2019-24 (renamed as the 'Partnership Plan') | To conserve and enhance the natural beauty of the AONB; and support sustainable social and economic development that is compatible with the landscape. | SA framework should consider the impact on landscape and related objectives identified in the management plan. |
| Cranbrook Plan DPD (Submission Draft version, 2019) | Cranbrook is a new community under construction in East Devon close to the city of Exeter. The DPD will help shape and direct future development within the Cranbrook Plan area. The Plan is currently at Examination, having been submitted in August 2019. | An SA of the Cranbrook Plan is being carried out. |
| Blackdown Hills AONB Management Plan 2019-2024 | Reflect the special qualities of this AONB, ensuring that planning policies should give it great weight, new buildings are designed to the highest standards, and affordable housing need is met in accessible locations. | SA framework should consider the impact on landscape and related objectives identified in the management plan. |
| Neighbourhood plans | Most of East Devon now has made neighbourhood plans. | The SA framework should consider objectives in neighbourhood plans. |

Appendix B – Draft Scoping Report summary of consultation responses and Council response

| Respondent | Succinct officer summary of issue raised | Officer response |
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| A Bentham | Reference should be made to local climate and ecological emergency declaration and associated plan and great weight should be attached. | Whilst we will look to update reference in background reports the scoping work does need to address all sustainability considerations and it would be inappropriate to overtly focus through it on just some specific issues. |
| | Use should be made of citizen juries and improved engagement work (both for the local plan and SA). | It is suggested that engagement overall is a bigger issue than SA production and if it has relevance it relates far more to the process of local plan production. Under the proposed timetable for producing the local plan it would not be possible to undertake more extensive public engagement. |
| | Page 56, Figure 26 - The table of sustainability impacts is considered too vague to be useful as many issue require more detail in policy with costs hidden as externalities. | The submission made appears to address potential policy approaches and options for the future local plan rather than SA specific matters. For the SA scoping work no changes are suggested. |
| | Concern is expressed about the SA referring too much to economic indicators of GDP and GVA and should identify alternative indicators, such as life expectancy, carbon emissions, and education, | These comments appear more relevant to making policy and potential local plan content rather than the SA. Fir the SA scoping report changes are not proposed. |
| Environment Agency It should be noted that the EA submitted comments on the issues report and the SA in the same letter. The SA comments, as summarised, appear around 2/3rds of the way down the letter. | Suggested that the first column in Figure 25 should be expressed more actively, specifically asking questions around potential outcomes. | It is agreed that this would be a useful amendment. |
| | In para 3.13 a more precise definition of the specific designation interest of the River Axe SAC is suggested. | This is agreed with and changes are appropriate. |
| | Para 3.20 should refer to the Districts rivers. | This is agreed with and changes are appropriate. |
| | Para 3.22 – threats to biodiversity should include historic legacy impacts to rivers. | This is agreed with and changes are appropriate. |
| | The climate change section should refer to the natural environment response to climate change. | This is agreed with and changes are appropriate. |
| | Para 3.46 – the text relating to the Exe Estuary strategy should be updated to note the dropping of managed realignment of the River Clyst. | This is agreed with and changes are appropriate. However the SA should not update any actual plan policy itself, as the submission text could perhaps be inferred to read/mean. |
| | Para 3.57 to 3.62 – text should refer to the physical form and function of rivers including | This is agreed with and changes are appropriate. |

| Respondent | Succinct officer summary of issue raised | Officer response |
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| | in respect of biodiversity and landscape value. Issues relating to the Rivers Axe, Otter and Sid are highlighted. | |
| | In section 5 – SA objectives 4 and 5 – heat, drought and storm extremes should be referenced. | |
| | In Figure 30 the reference to a 2009 document - South West River Basin Management Plan (Environment Agency, 2009) – is out of date and needs updating plus the River Exe Restoration Plan should be referred to. | This is agreed with and changes are appropriate. |
| | Duty to cooperate considerations – the text should note and account taken of the fact that river catchments do align with local authority boundaries. | Agree and additional text to the SA is appropriate. |
| | The SA text should refer to emerging Local Nature Recovery strategies in Devon, Dorset and Somerset. | Agree and additional text to the SA is appropriate. |
| Forestry Commission England | Para 3.17 and 3.18 – extend text to refer to ancient woodland and veteran trees – see NPPF para 175. | Agree and additional text to the SA is appropriate. |
| | The representation highlights a number of benefits that that tree planting can play in respect of green infrastructure matters, flood risk and renewable and low carbon energy | We will seek to adjust the SA text to incorporate headline matters raised. However these matters will and should be considered in more detail in the local plan policy making processes. |
| Historic England | Comments on - Task A1 – Policy context – other relevant, plans, policies and programmes and Appendix 1 and Figure 30 – A number of additional documents are highlighted that should be referenced in the SA work. | Agree and additional text to the SA is appropriate. |
| | Comments on Task A2 - Task A2 - Collecting Baseline Information - The landscape and seascape of East Devon. Historic England highlight a number of areas where text in the SA should cover more ground, including in respect of: <ul style="list-style-type: none"> • Cultural heritage; • Registered parks and gardens being heritage assets; • presence and density of heritage assets along East Devon’s coastline - which include the Jurassic Coast World Heritage Site; • The concept of seascape could be usefully explained. | In principle the matters raised are agreed with and attention will be given to incorporating amendments to address points raised. There may, however, be benefit in further conversation with Historic England on matters of detail that they highlight. |

| Respondent | Succinct officer summary of issue raised | Officer response |
|------------|---|---|
| | <p>In general a need is seen for more evidence for identifying sustainability issues, predicting and monitoring likely effects and assessing alternative solutions.</p> <p>Task A2 – Collecting - Baseline Information Historic environment, built heritage and design quality.</p> <p>English Heritage identify additional information that should inform the evidence base for sustainability issues. They highlight:</p> <ul style="list-style-type: none"> • all heritage asset types should be referenced and it should be noted that their settings can also positively contribute to their significance; • text should explain the difference between designated and non-designated heritage assets; • Figure 4 should provide the information source(s) and dates for this data; • Figure 4 should also seek to provide information on non-designated heritage assets including buried, waterlogged archaeological and paleoenvironmental remains of significant interest; • Information should be presented on heritage at risk through neglect, decay and other threats; • Efforts should go into identifying the current and likely future condition of East Devon’s historic environment, and threats as well as opportunities related to the conservation, enhancement and enjoyment of heritage assets; • No information has been provided on the existing local plan, including relevant policies, how it has performed against its vision, issues and objectives for heritage assets; • The section on design quality does not acknowledge positive contribution that heritage assets can make to local character and distinctiveness as per paragraph 185 of the NPPF 2019 and the National Design Guide and the emerging National Model Design Code. <p>It is suggest that a Heritage Topic Paper should be prepared to inform the SA and the new Local Plan.</p> | <p>In principle the matters raised are agreed with and attention will be given to incorporating amendments to address points raised. There may, however, be benefit in further conversation with Historic England on matters of detail that they highlight and there is need for further clarity on a number of matters – including in respect of whether all points raised do really need to be included in the SA and whether inclusion could make the document rather unwieldy and long.</p> |

| Respondent | Succinct officer summary of issue raised | Officer response |
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| | <p>Task A3 – Identifying - key sustainability issues.</p> <p>English Heritage identify a number of key sustainability issues that should be identified, to include:</p> <ul style="list-style-type: none"> • Landscape: should be broadened to cover seascape and townscape; • Historic and built environment: should be broadened to cover all types of designated and non-designated heritage assets. • Quality of new development: should recognise the positive contribution that heritage assets can make to local character and distinctiveness and to high-quality development. <p>Without addressing these matters the likely future trends without a new local plan cannot be considered to be robust.</p> | <p>Points are agreed with and changes would be appropriate.</p> |
| | <p>Task A4 – Defining sustainability objectives.</p> <p>English Heritage advise that changes should be made to the following objectives:</p> <p>2. Landscape - delete ‘our natural environment’ from the objective to recognise the historic character of landscapes and seascapes and include a reference to seascape character in factors.</p> <p>3. Historic and built environment:</p> <ul style="list-style-type: none"> • reword title to read ‘heritage assets; • include reference to World Heritage Site, Registered Parks and Gardens and locally listed heritage assets • incorporate a new bullet point that seeks to address heritage at risk as a factor • reword the second bullet point ‘sustain the historic environment and promote local character and distinctiveness by conserving and enhancing the significance of heritage assets and their settings and creating high quality new settlements, townscapes, developments, built environment and public realm’ • reword the third bullet point: ‘sustain the historic environment and promote | <p>It will be relevant to look on further detail at the points raised to identify specific changes that may be appropriate and desirable. To this end a conversation with English Heritage would be appropriate.</p> |

| Respondent | Succinct officer summary of issue raised | Officer response |
|-----------------|---|--|
| | <p>local character and distinctiveness through urban design, build quality and detailing of new buildings, alterations/extensions to existing buildings, streets, and spaces;</p> <ul style="list-style-type: none"> include a new bullet point that focusses on the enjoyment of the historic environment given paragraph 185 of the NPPF 2019. <p>They conclude by advising that the factors should recognise the holistic nature of the historic environment and its interrelationships with other Sustainability objectives, they cite climate change considerations and town centres.</p> | |
| Naome Glanville | Page 14 – reference should be given to presence of otter and beaver in the river Otter. | Whilst not core to the SA inserting reference does give some positive local flavour and changes are seen as desirable, |
| | Page 32 – reference should be made to noise from the A30 and reference is made to EDDC to lobby for resurfacing. | Referencing noise from the A30 would be reasonable for the SA but it would not be the job of the SA to lobby for resurfacing (if lobbying were seen as desirable it would fall outside of the local plan and tasks that support its production). |
| | Page 53: No's 1 (Biodiversity) and 2 (Landscape) – Considered that the value of biodiversity and landscape should be acknowledged as something that should be preserved for residents and for visitors to enjoy. And also that biodiversity is important in not just AONBs but across East Devon and links to the wider planet. | The points raised are not challenged, however on review of the existing scoping report text it is not clear where any changes could be relevant. |
| | Encouragement is given for tree planting. | Whilst more tree planting is not challenged it would not be appropriate to amend the SA but in due course the local plan can look to tree planting related policies. |
| | Page 53 – SA Objective 4 – encouragement is given to home working. | This can be an issue to consider and think about in local plan policy production but is not directly relevant to the SA scoping report content. |
| Natural England | <p>Task A1 - Policy context</p> <p>Natural England advise of the types of plans that should feature in this task of work.</p> | The list supplied will be reviewed to assess whether any changes or additions are appropriate. |

| Respondent | Succinct officer summary of issue raised | Officer response |
|------------|---|---|
| | <p>Task A2 – Baseline information</p> <p>Natural England provide general comment on this stage of the SA work, including on evidence sources. They specifically comment on the relevance of evidence to help inform key strategic growth areas.</p> | <p>The comments made are noted but are not identified as generating need for changes to the SA scoping report.</p> |
| | <p>Task A4 - Sustainability objectives</p> <p>Natural England make a number of comments against the SA objectives, these are:</p> <ul style="list-style-type: none"> • <i>Biodiversity</i> – include a sub-objective which seeks to ensure current connectivity between habitats is not compromised, and that future improvements in habitat connectivity are not prejudiced. There is a need to consider the possible impact pathways between policy proposals and habitats and species impacted. The objective could include a commitment to deliver biodiversity net gain. • <i>Landscape</i> – the sub-objectives should provide a more detailed enquiry into the sustainability of the plan by asking whether the plan conserves and enhances the special qualities and distinctive character of the landscape and undeveloped coast. • <i>Land resources</i> – the sub-objective against which the plan will be assessed should set out an intention to avoid, and not just minimise, loss of best and most versatile agricultural land. • <i>Health and activity</i> – this objective would be stronger if it made it clear that assessment of the sustainability of the plan with regards to health and activity would be seeking enhanced provision of recreational resources but will also look to avoid impacts on the quality and extent of existing green infrastructure assets that have a recreational function. | <p>The points made are agreed with and it will be appropriate to incorporate changes to the SA scoping report to address concerns raised.</p> |
| | <p>Task A5 – Scope of the SA</p> <p>Natural England highlight that the SA Framework should include relevant indicators to monitor the potential significant environmental effects of implementing the plan. They suggest some possible indicators that could be incorporated.</p> | <p>It will be appropriate, in due course, to look at indicators for incorporation into the SA work</p> |

| Respondent | Succinct officer summary of issue raised | Officer response |
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| <p>Pegasus Group on behalf of Land Value Alliances LLP</p> <p>Please note that the representation is not included in Appendix 1 but the full SA relevant submitted text, taken from an issues report submission, is reproduced.</p> | <p>Pegasus Group advise: 10.1 We are largely satisfied with the objectives that have been identified in the SA Scoping Report. 10.2 However, we do have concerns with the proposed metrics for assessing potential development sites. There are concerns that proposals for new towns and/or villages will perform poorly on the basis that these will be proposed in locations where there will be limited to no services and facilities available. However, a key benefit of new towns is that they are able to deliver a comprehensive range of jobs, infrastructure and services within convenient walking distance of their residents. This needs to be captured somehow in the SA or acknowledged as the conclusions of the SA are used to inform potential locations for future development.</p> | <p>The SA work will indeed need to consider the jobs, infrastructure and services that a new town may deliver and such potential provision will be captured, in due course, through the SA work.</p> |
| <p>Savills for Carter and Crealy Farm</p> | <p>Issue is raised that policies judged against Objective 8 (Homes) should have a more positive score if they deliver a larger number and mix of housing, incorporate a diversity of supply and include the provision of affordable housing.</p> | <p>As this is a comment about application of the SA and not scoping report content changes to the SA would not be appropriate.</p> |
| | <p>Concern raised that some objectives, they cite No 3 – Historic and Built Environment, can be challenging to quantify and should not be measure against just such matters as proximity of any proposal to an asset. A judgement should be taken of actual potential adverse impacts and possible mitigation.</p> | <p>The points raised are noted and not challenged. However, it is not regarded that changes are needed to the SA scoping report in response. The issue at stake is the application of h SA work in practice.</p> |
| | <p>In respect of Figure 27 – distance of potential development sites to facilities, the distances should apply to both existing facilities and proposed new facilities.</p> | |
| | <p>In para 5.8 the proximity of faculties should include employment sites and that a further tier of +3 should apply to development sites within 800 metres of basic services or bus/rail and 1,600 metres of employment opportunities with 1,600 metres being considered a reasonable commuting walking distance</p> | <p>It is agreed that employment opportunities should feature in para 5.8 and changes should be made, though some thought will need to be given to establish what constitutes and employment opportunity. However it is not agreed that 1,600 is a reasonable walking distance and we are not are of any evidence to back this claim up.</p> |
| <p>Sid Valley Association</p> | <p>The document should be updated to reflect the fact that we have left the EU and comment made on any legislative changes and sources in the document need to be fully referenced.</p> | <p>It will be appropriate to review reference to legislative matters but it is understood that departure from the EU does n, at this point, change legislative requirements. Referencing in the</p> |

| Respondent | Succinct officer summary of issue raised | Officer response |
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| | | document can be usefully reviewed to ensure consistency. |
| | On page 13 - Reference should be made to where protected sites can be located. | Whilst we will endeavour to find a public record reference this is not required for SA purposes. |
| | Para 3.36 – a query is raised about if a design guide is proposed. | This falls outside of the scope of SA work and no changes are proposed. |
| | Para 2.41 – concern is raised that agricultural carbon emission are not stated. | It was not previously possible to identify a data source but we will review this point. |
| | Para 3.55 - Since EDDC is the waste collection authority why is no data available for the volume of ED waste? | This issue can be looked into. |
| | Para 3.65 - Age table - there is a need to break down the over 65s further, this is a significant issue and you cannot equate a 65 yr old with an 80 yr old. This is particularly significant given the large increase projected by ONS (quoted in the ORS report) in the number of people aged over 75 (13,390 people, representing 57% of total population growth) | For SA purposes it is not regarded that a finer grained age breakdown is needed. |
| | Para 3.74 – It is considered that housing and household projections re needed, not just population projections. | For SA purposes it is not regarded that such information is needed, its relevance would rest with policy making itself. |
| | Para 3.79 – its advised that the affordability ratios are expressed 'upside down' making a nonsense of statements about trends. Figure 11 expresses this ratio correctly. | This point is not understood –no changes are proposed. |
| | Paras 3.89-3.94 - The sections on air pollution and noise pollution are particularly weak, and downplay the impact of traffic on main roads passing through the district. | Whilst we will seek out further information and evidence gathering will need to be proportionate to relevance for SA work and available resources. It may be possible to add changes. |
| | Para 3.124 - There need to be data on part time and casual working. | If available we will seek to source but it is not deemed essential to support SA work. |
| | Para 3.136 - It is the Paddington line that runs through the west of the district with no stations, not the Waterloo line. Why focus on the line that has no stations, rather than the one that is important locally both as a link to London and as a commuter route? | This line error will be corrected. |
| | Concerb us expressed about lack of reference to cycle routes and traffic accident data? | Whilst not deemed essential for SA purposes we will see if relevant data is available. |

| Respondent | Succinct officer summary of issue raised | Officer response |
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| | It is queried why section 4 is included and why it sets out impacts in the absence of a local plan. | Inclusion of this section reflects legal requirements for the work. Relevance references should be included in the text to clarify this matter. |
| | Figure 25 is regarded as an “ill thought out mess, needing a lot more work”. This conclusion is contested and the table is identified as appropriate, albeit it others have suggested elements of refinement. | The assessment is not agreed and changes are proposed. |
| | Figure 26 is considered to be more appropriate if it were to define sub-objectives and the respondents advise “are unconvinced a mechanistic approach like this is helpful”. | The approach being taken is widely used and it is not considered that changes are appropriate |
| Sidmouth Town Council | <p>Task A2</p> <p>The collecting of baseline data is welcomed and it is noted that in the Sid Valley hedgerow loss has been great with biodiversity loss. It also noted that Broadband performance is variable including poor in some town locations.</p> | Points raised are noted – o changes to the SA scoping report are proposed. |
| | <p>Task 3</p> <p>Matters raised in respect of Task 3 are noted below:</p> <ul style="list-style-type: none"> • Information on the relevance and importance of hedgerows and trees is identified. • The plan need consider how the carbon footprint of existing buildings can be reduced. • Take away food outlets are a feature of all towns but the litter created by them can be significant. • The report highlights the poor quality of broadband connections in parts of East Devon, highlighting the more rural areas. However, there are also significant broadband issues in towns such as Sidmouth. | The points raised are noted and a review will be undertaken to see if there is relevance to include reference in the scoping report. However they are more relevant actual policy making on the plan. |
| | <p>Task 4</p> <p>Matters raised include:</p> <ul style="list-style-type: none"> • Biodiversity - EDDC should work with local land owners and farmers to examine and extend best practice in hedge maintenance. It should work with Devon County Council and Highways England to | The points raised are considered to be largely operational matters for council function or matter that fall to possible plan policy rather than content of the SA scoping report. Whilst the Council (DDC) may choose to pick up on these issues elsewhere they are not directly relevant to SA content. |

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| | <p>evaluate and improve the roadside hedgerows.</p> <ul style="list-style-type: none"> • Historic and Built Environment – Any changes to the Esplanade and sea front as part of any Beach Management Scheme must be in keeping with the character of the area and must maintain the connection between the Town and the sea. • The Council should seek excellence and quality in all additions to our built environment. The green spaces, corridors, conservation areas, and views laid out in the Sid Valley Neighbourhood Plan should be protected. • Climate change and carbon emissions – Minimising carbon emissions is indeed a vital objective for the plan but the plan actions should also include EDDC leading by examples in their offices and other property as well as in the activities they perform. • Land Resources – In addition to enhanced recycling EDDC should seek to encourage reuse or repurposing of both personal and council assets wherever possible. • Wellbeing – Take away food licencing should be far more tightly linked to efforts to control littering . • Town centres – Working with Devon County Council, EDDC should seek to pedestrianize town centres to make them a more pleasant place to be, and to support local businesses. | |
| | <p>In their Appendix the town council include a matrix comparing Sidmouth Town Council policy against, amongst others, EDDC Local Plan considerations.</p> | <p>Whilst an interesting comparative table there are no identified changes that it is considered should be made to the SA in respect of this matrix.</p> |
| <p>T Dumper</p> | <p>The importance of qualitative data is highlighted as is the significance of biodiversity. Tough scepticism is expressed around Government commitments to resist biodiversity loss.</p> <p>Specific topic matters highlighted in the submission include:</p> <ul style="list-style-type: none"> • Waste - reducing material use and re-use are even more important than recycling, the low waste per household in ED needs | <p>The points raised are noted.</p> <p>The points raised are noted, their potential relevance relate, however, to the policy making process rather than the actual SA work.</p> |

| Respondent | Succinct officer summary of issue raised | Officer response |
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| | <p>factoring in with incineration and landfill being damaging</p> <ul style="list-style-type: none"> • Public Transport -, we need better services, buses and trains, and made cheaper and more accessible. • Active travel needs to be encouraged everywhere, not just to meet Government criteria. • Population Balance - To maintain balance, rather than a perpetually ageing population we need sustainable employment and housing policies. • Housing - There should be proper mention and encouragement of social rented housing. • Employment Policy - We should be doing everything possible to minimise commuting to Exeter and other places to create self-sufficient local places. | |
| <p>Transition Exmouth</p> | <p>The respondents raise a number of matters in their submission, these in summary, are:</p> <ul style="list-style-type: none"> • Acknowledgement should be given to the 'Shifting Baseline Syndrome'. We should recognise much higher levels of biodiversity in the past. • In respect to climate change local authorities should educate the public. • There should be a baseline understanding of cycle land and their se promoted, whilst charging points should be available. • More weight should be given to securing segregated cycle lanes. <p>The representation replicates a number of matters covered by T Dumper, above.</p> | <p>The points raised are noted, their potential relevance relate, however, to the policy making process rather than the actual SA work.</p> |