

Report to: Strategic Planning Committee



Date of Meeting 27 April 2021

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Sustainability appraisal feedback report

Report summary:

This report provides information on feedback received to the consultation on the local plan Sustainability Appraisal scoping report. In the light of comments received minor amendments are proposed to the scoping report.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee afford delegated powers to the Service Lead – Planning Strategy and Development Management – to make changes to the Sustainability Appraisal scoping report to address comments made in feedback received as detailed in Appendix 1 to this report.

Reason for recommendation: To ensure that Members are given the opportunity to review comments made on the sustainability appraisal scoping report.

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Portfolio(s) (check which apply):

- Climate Action
- Corporate Services and COVID-19 Response and Recovery
- Democracy and Transparency
- Economy and Assets
- Coast, Country and Environment
- Finance
- Strategic Planning
- Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information – See links in the attached the report.

Link to [Council Plan](#):

Priorities (check which apply)

- Outstanding Place and Environment
 - Outstanding Homes and Communities
 - Outstanding Economic Growth, Productivity, and Prosperity
 - Outstanding Council and Council Services
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1 Introduction

- 1.1 At Strategic Planning Committee on the 30 March 2021 a local plan work programme was agreed. The programme advised that for this meeting (27 April 2021) a paper on the matter below would be considered:

“Sustainability Appraisal Feedback - This report will provide information on feedback on the Sustainability Appraisal scoping report consultation and more information on how the work may inform policy development..”

2 The Sustainability Appraisal (SA) scoping report and the reasons for consultation

- 2.1 Local Plan production needs to be supported by an exercise called Sustainability Appraisal (SA). It is a process that seeks to assess the environmental, social and economic impacts that could arise from implementation of plan policy and in so doing the work should help inform strategy and policy choices as a plan evolves from early drafts through to the final document.
- 2.2 SA starts with a scoping report that seeks, amongst other outputs, to establish what East Devon is like now so that the potential impacts of future policy can be measured and compared against a baseline position. At the Strategic Planning Committee meeting on the 15 December 2020 approval was given for consultation on the draft scoping report. The consultation ran from the 18 January 2021 to 15 March 2021 in parallel with, but separate to, the consultation on the local plan issues and options report.
- 2.3 The scoping report that was consulted on can be viewed at:
[151220bpdraftsascopeingreporteastdevonlocalplanver02.pdf](#)
- 2.4 There is a legal requirement that consultation is undertaken, specifically to include with the Environment Agency, Natural England and Historic England. But consultation is also seen

as helpful and good practice to help inform the SA work overall. The consultation was open to anyone to respond to.

3 Feedback received on the scoping report consultation

3.1 We have logged twelve representation from organisations and individuals that sent in representations on the SA scoping report. These representations were from the respondents listed below.

- A Bentham
- Environment Agency
- Forestry Commission
- Historic England
- Naome Glanville
- Natural England
- Pegasus Group on behalf of Land Value Alliances LLP
- Savills for FWS Carter and Crealy Farms
- Sid Valley Association
- Sidmouth Town Council
- T Dumper
- Transition Exmouth

3.2 It should be noted that in addition to the bodies and organisations that made specific comment on the scoping report there were a number of respondents to the issues and options report that referred to the relevance and application of SA work in respect to the evaluation of future policy choices. Such submissions did not, however, propose changes to the scoping report or assess content. As such further details of submissions made and comments on them are not included in this feedback report.

3.3 A further note is that there may have been documents that were uploaded, alongside questionnaire submissions, to the issues and options report consultation that also referred to the SA work. At this stage it has not, however, been possible to review all uploaded documents that were received through the issues and options consultation. A supplementary report (at a later date) will need to be provided to Committee should there be further substantive points raised in any of these representations. In asking for comments on the SA scoping report we did explicitly ask for them to be sent in separately from issues and report comments, but this (unfortunately) was not followed in all cases by all respondents.

3.4 Appendix 1 to this report forms a summary table of matters raised by respondents to the SA report with a brief officer summary of suggested proposed changes to the scoping report. It should be noted that in some representations received comment is made around the preferred nature and direction of specific local plan policy, rather than the content of the SA. It will be desirable and appropriate for the Council to fully consider the potential approach to and options for policy development when it comes to actually writing the local plan. But it is suggested that the SA work should seek, as far as possible, to be policy neutral in its stance and in so doing should establish a framework to assess alternative policy options

rather than in any sense pre-determining policy choices and outcomes. In this context it is important to stress that the SA forms one consideration in helping to inform possible future policy, it forms part of the evidence, alongside other considerations, to inform choices.

- 3.5 It should also be noted that some representations raise matters that go outside of the remit of planning policy and the local plan falling, for example, into what would be operational matters of other departments of the council or beyond the operations of East Devon District Council.
- 3.6 The full representations to the SA scoping report consultation can be seen in Appendix 2, though that is with the exception of the submission made by Pegasus Group on behalf of Land Value Alliances LLP. In this case the submission text relevant to the SA formed a small part of a much longer issues and options report submission so just the text relevant to the SA specific work is reproduced in the table in Appendix 1. In the case of Savills, on behalf of clients, Appendix 2 just includes extracts, from a fuller issues report submission, that are relevant to the SA,
- 3.7 Appendix 1 notes that the officer recommendation is for a number of changes to be made to the SA scoping report. These are essentially in respect of matters of detail and presentation and they do not significantly change the work or process of undertaking the actual SA of the emerging plan proposals. The SA scoping report was produced to a standard type of style and format, extensively used elsewhere in the County and previously applied in East Devon, so wholesale changes would not be expected.

4 Application of the SA in plan making

- 4.1 The SA is intended to be an iterative process that is carried out through plan production. As strategic and bigger items and issues are considered, and specifically alternative options are compared, they should be assessed against sustainability objectives included in the SA scoping report. The comparative assessment should inform thinking on choices made. This SA 'testing' should carry through as plan making progresses to matters of increasing policy detail.
- 4.2 The SA process will not just look at wording of policy, it will also apply to specific sites that could form potential allocations for development. A key outcome should be a consistent basis to consider possible site choices for land allocations. This same logic of assessment should also apply to policy boundaries that will feature on maps (that are not allocations for development).

5 Next steps

- 5.1 In response to the recommendations in this committee report (and any further changes or amendments from Committee) the SA scoping report will be amended and updated. New text will be added to advise of the consultation work that has been undertaken to date and how this has informed changes to the document.
- 5.2 In terms of actual assessment of policy and site choices committee attention is drawn to Section 5 (Task A4), from page 54 of the consultation draft SA scoping report onward. This sets out sustainability objectives against which emerging plan policies will be assessed.

Policy and site options will be 'scored' against possible impacts. Conclusions drawn from the work should help inform (but not dictate) future policy choices.

- 5.3 As the SA work progresses additional SA reports will be produced and published. These will specifically be in respect of the proposed draft plan and also the published plan that will be submitted for examination.
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Financial Implications

There are no direct financial implication in the recommendation. There will however be funding implication flowing from the Masterplan but these will be assessed and presented to members separately for consideration when they arise.

Legal Implications

The legal position is detailed in the report and no further comment is required.

Appendix 1- Succinct summary and officer response to comments made on the SA scoping report

Please note that table below contains a succinct summary only, by officers of the Council, of matters raised in consultation on the SA scoping report. The full text (other than where noted in this appendix) of representations made can be seen in Appendix 2 to this report.

Respondent	Succinct officer summary of issue raised	Officer response
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. It is already intended to undertake extensive consultation and engagement on the Local Plan.
	Page 56, Figure 26 - The table of sustainability impacts is considered too vague to be useful as many issues 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. For 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 in respect of biodiversity and landscape value. Issues relating to the Rivers Axe, Otter and Sid are highlighted.	This is agreed with and changes are appropriate.
In section 5 – SA objectives 4 and 5 – heat, drought and storm extremes should be referenced.	This is agreed with and changes are appropriate.	

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	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 general a need is seen for more evidence for identifying sustainability issues, predicting and monitoring likely effects and assessing alternative solutions.	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.
	Task A2 – Collecting - Baseline Information Historic environment, built heritage and design quality. English Heritage identify additional information that should inform the evidence base for sustainability issues. They highlight: <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; 	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

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	<ul style="list-style-type: none"> • 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>whether inclusion could make the document rather unwieldy and long.</p>
	<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>It will be relevant to look in further detail at the points raised to identify specific changes that may be appropriate and desirable. To this end a conversation</p>

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	<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 local character and distinctiveness through urban design, build quality and detailing of new buildings, alterations/extensions to existing buildings, streets, and spaces; • 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>	<p>with Historic England would be appropriate.</p>
Naome Glanville	<p>Page 14 – reference should be given to presence of otter and beaver in the river Otter.</p>	<p>Whilst not core to the SA inserting reference does give some positive local flavour and changes are seen as desirable,</p>
	<p>Page 32 – reference should be made to noise from the A30 and reference is made to EDDC to lobby for resurfacing.</p>	<p>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).</p>
	<p>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</p>	<p>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.</p>

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	<p>but across East Devon and links to the wider planet.</p> <p>Encouragement is given for tree planting.</p> <p>Page 53 – SA Objective 4 – encouragement is given to home working.</p>	<p>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.</p> <p>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.</p>
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>	<p>The list supplied will be reviewed to assess whether any changes or additions are appropriate.</p>
	<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>

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	<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>
<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:</p> <p>10.1 We are largely satisfied with the objectives that have been identified in the SA Scoping Report.</p> <p>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>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>
Savills for Carter and Crealy Farm	<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 the 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>It is reasonable that assessment is made based on existing facilities and clearly weight should also be given where new facilities are coming forward as well. Suitable wording to cover this point will be added to the SA.</p>
	<p>In para 5.8 the proximity of facilities 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 an 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>
Sid Valley Association	<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 not, at this point, change</p>

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		legislative requirements. Referencing in the 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.
	Concern is 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.
	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”.	The assessment is not agreed and changes are proposed.
	Figure 26 is considered to be more appropriate if it were to define sub-objectives	The approach being taken is widely used and it is not considered that changes are appropriate

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Sidmouth Town Council	<p>and the respondents advise “are unconvinced a mechanistic approach like this is helpful”.</p>	
	<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>	<p>Points raised are noted – o changes to the SA scoping report are proposed.</p>
	<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. 	<p>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>
	<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 evaluate and improve the roadside hedgerows. • 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 	<p>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.</p>

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	<p>property as well as in the activities they perform.</p> <ul style="list-style-type: none"> • 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>
T Dumper	<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>The points raised are noted.</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 factoring in with incineration and landfill being damaging • 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>The points raised are noted, their potential relevance relate, however, to the policy making process rather than the actual SA work.</p>
Transition Exmouth	<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. 	<p>The points raised are noted, their potential relevance relate, however, to the policy making process rather than the actual SA work.</p>

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	<ul style="list-style-type: none"><li data-bbox="328 143 935 203">• In respect to climate change local authorities should educate the public.<li data-bbox="328 210 935 309">• There should be a baseline understanding of cycle land and their use promoted, whilst charging points should be available.<li data-bbox="328 315 935 376">• More weight should be given to securing segregated cycle lanes. <p data-bbox="328 383 935 443">The representation replicates a number of matters covered by T Dumper, above.</p>	

Appendix 2 – Representations made on the SA scoping report

This appendix reproduces the representations made on the SA scoping report in full.