

## A BENTHAM

### Response to the Sustainability Assessment Report – Scoping Report

#### Relevant and related issues to the Sustainability Appraisal Scoping Report.

This report has to be brought up to date by including the local climate and ecological emergency declaration and associated plan, which should underpin all aspects and spelt out more specifically in term of the effects and the need to act to mitigate and adapt.

The consultations of the local plan and the associated reports, including the sustainability appraisal should have improved procedures of citizens' engagement and consultation, which would include more opportunities for local people to interact with the process and could include citizens' assemblies.

Acknowledging that climate change is man-made means accepting that there are lines of human action that can be exposed in accountable ways. More use of prohibitive policy to stop bad development and to ensure that the costs are not born locally should be included.

**Page 56, Figure 26. The table of sustainability impacts** is rather too vague to be useful as many issue require more detail in policy and some issues need to be more boldly defined in policy to feed into the local plan.

Issues that have been regarded as a generalised issue and with the costs hidden as externalities, should now be subject to strong lines of accountability with respect to a clear assessment of the impact of the proposed development. The real effects from climate change to the local area must feed into development policy in more specific ways – e.g. the effects of increased green house gas emissions is causing flooding so this *will* have environmental, social and economic impacts for which specific developments have to take account. The lines of accountability have to be made clear and fed within local planning policy. Similarly the effects of pollution resulting from development must be widened, e.g. the effects of plastic waste from a proposed development.

**Give greater weight to the effects of climate change by having more meaningful metrics as a policy condition within the planning process.**

- Need to ensure there are more specific metrics as regards local carbon emissions and the effects of development in contributing to the increase in the areas carbon emissions to enable a fuller assessment of harm.

Recently a planning inspector said about the proposed gas station development at Exmouth, that he found it difficult to assess the comparative adverse effects of the increased carbon emissions caused by the proposed development against the stated benefits of the development, because of the lack of such metrics relating to green house gas emissions. Such specific metrics must be included in the local plan policy as part of the planning process to fully assess development against climate change and environmental emergency plans. Developers must be fully accountable for unnecessary green house gas emissions that will conflict with the limitations set by local emissions targets so that proposals can be refused on that basis.

The local plan needs to ensure that it does not conflict with the climate and ecological emergency, should underpin and feed into the local plan in a meaningful way when policy is formulated, and include any relevant metrics that must be drawn on in assessing development.

### **Economic Development and job creation.**

I think we should be careful about being drawn into a narrowly framed narrative where the definition of jobs, better paid job, higher paid skills often ignores many of the essential and real activities that takes place in our local community and that need to take place in our community for it to function successfully.

Measures of economic progress are dominated by present established economic indicators of GDP and GVA. I think that the scoping report should make it clear that even though present national and Government documents are driven on the basis of these, there is wide spread criticism of the dependence on their use, and for the local plan, it is important to move beyond these indicators, focusing instead on a dashboards of alternative indicators, such as life expectancy, carbon emissions, and education, which can support a reorientation of develop policy goals going into the future. A new Development Plan must enable decision-making guidance to be fit for high uncertainty in a crisis-prone world and look to other measures of progress. Because the Government is behind the curve on this does not mean that local government has to be. Other local areas are making these issues clear, that economic growth is not enhancing life satisfaction, alleviating poverty, or

protecting the environment and is not, therefore, providing a viable vision for the future.

The problem with present established growth indicators are that they fail to measure the right outcomes and send us down policy paths that are damaging to our communities, producing the wrong sort of development. For example houses that generate investment platforms that provide asset base for financial speculation and large profits for some but do not add to the affordable or social homes required at reasonable rents in the local community. Housing becomes a debt based asset class which introduces crisis and instability both to the home ownership and the rental sector, rather than producing an outcome that meets the fundamental need to have a home. Housing development is an endless pursuit of profit, and has led to a policy outcome which includes the developers “get out clause” of the viability assessment.

In considering local development we need to reorder priorities and to turn away from a growth imperative, that pushes profit through value added in financial terms that can only be serviced by high personal, interest bearing debt. It turns debts into assets through the process of securitisation (packaged up and reproduced on the asset side of accounting sheets) and pressures us to consume in quantities and ways that are detrimental to ourselves and our communities and that often does not support the wider local economies.

If this continues to underpin development it is neither sustainable nor stable. It is prone to crisis, and local development takes a hit, as do the lives and well being of local communities.

# ENVIRONMENT AGENCY

Mr Matthew Dickins - Planning Policy  
Manager  
East Devon District Council  
The Knowle  
Sidmouth  
Devon  
EX10 8HL

**Our ref:** DC/2006/000243/CS-  
05/IS1-L01  
**Your ref:**  
**Date:** 15 March 2021

Dear Mr Dickins

## **A new local plan for East Devon Issues and Options Report, Sustainability Appraisal Scoping Report and Duty to Cooperate**

Thank you for your consultations in respect of the issues and options report, sustainability appraisal (SA) scoping report and duty to cooperate for the emerging local plan for East Devon district.

### **General comments**

We consider that it is essential that climate change mitigation and adaptation are central to the new Local Plan. Furthermore, when considering climate change adaptation and resilience the plan should look at the wider natural environment, not just be focussed on flooding and coastal erosion. It is also important that the plan helps to support and enhance the district's rivers and estuaries; focussing on more than just water quality.

Our comments and advice on the issues and options, SA scoping and duty to cooperate are set out below.

### **Issues and Options Report**

#### Chapter 2 - Objectives, scope and background

We are supportive in principle of the plan's proposed objectives, not least Objective 1 (health and well-being), Objective 2 (climate emergency), Objective 8 (natural environment) and Objective 10 (infrastructure) (**Question1**).

With regard to Objective 2, we are pleased to see equal commitment to climate change mitigation and adaptation. It is important that all areas play their part in helping the World move towards achieving net-zero carbon emissions. However, a degree of climate change is now unavoidable so it is essential that local areas do all they can to

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Cont/d..

ensure they adapt and are resilient to the impacts of climate change. This includes impacts such as flood risk, coastal change, habitats and water resources.

Whilst zero carbon at the district level will have little overall effect on global emissions, ensuring the district can adapt and is resilient to the inevitable impacts of climate change will make a big difference to long-term sustainability locally. For this reason the achievement of Objective 8 (To protect and enhance our outstanding natural environment and support an increase in biodiversity) is inextricably linked to the climate emergency objective.

The section on 'What East Devon is like now' (paragraph 2.3) notes the district's 'spectacular coastline, hills, and valleys' and 'stunning countryside'. However, this aesthetic beauty masks the degraded condition of the district's rivers. Paragraph 2.4 notes the importance of agriculture in East Devon and how it shapes the countryside without acknowledging the negative impact it also has on the district's environment. For example, the Axe Special Area of Conservation (SAC) is under pressure from agriculture, as well as physical land management and infrastructure. The River Otter's historic management results in instability that threatens infrastructure and communities (such as at Ottery St Mary, Cadhay Bridge and Newton Poppleford). This new Local Plan is therefore key to supporting the improvement of these rivers and assisting communities and infrastructure to adjust.

#### Chapter 3 - Designing for health and wellbeing

We are pleased to see that paragraph 3.5 recognises that access to the natural environment has benefits for mental and physical health and well-being. We consider the active promotion of health and well-being through the plan to be absolutely essential (**Question 4**).

#### Chapter 4 – Tackling the climate emergency

Despite the fact that Objective 2 refers equally to climate change mitigation and adaptation the discussion regarding 'Tackling the Climate Emergency' seems to be primarily concerned with reducing carbon emissions as a way to reduce climate change, not adaptation/resilience to the impacts. Indeed, the impacts of a changing climate are already being realised, not just in terms of extreme weather events but also on wildlife. It is essential, therefore, that the plan considers possible ways to adapt/be resilient to these changes such as providing bigger/better/connected habitats for the benefit of biodiversity and natural flood management (NFM) measures.

Adaptation of the Exe Estuary SPA and Ramsar site needs to be addressed within the Local Plan. However, coastal change adaptation also needs to be considered along the coastline (World Heritage Site), especially at Sidmouth, but also Seaton and Budleigh Salterton.

Increased risks of flooding will also increase the pressure on the river network, as such issues of instability of the River Otter are liable to intensify in the future, with the need for the local plan to support adaptation of infrastructure and communities.

Nevertheless, in respect of **Question 5** we would support option 1, that new development should be net-zero carbon from plan adoption.

With regard to 'maximising energy from renewable sources' we have no specific preference for the options set out in **Question 6** about the provision of solar arrays/farms and windfarms. However, it is worth noting that the present draft revisions to the National Planning Policy Framework (NPPF) propose adding solar arrays to wind

turbines as 'essential infrastructure' and therefore can be appropriate in areas at risk of flooding subject to satisfying the exception test.

A number of suggestions are made under 'additional carbon neutrality policy objectives'. Paragraph 4.8 6) suggests 'Encouraging tree planting which will help take large amounts of carbon dioxide out of the atmosphere' and promoting 'other land use changes to promote carbon removal or storage'. These suggestions are welcomed but could be widened to include the use of natural processes and resources which can provide Natural Flood Management within river catchments as well as carbon sequestration.

Whilst we support the statement in paragraph 4.8 7) that 'we will also need to mitigate or adapt to the impacts of climate change...', we consider that this is insufficient given the significant risks posed by climate change and the difference climate change adaption/resilience will make to long-term sustainability locally. Furthermore, properly adapting to climate change within communities at risk of flooding and coastal change could have significant consequences for urban design and street scene (e.g. finished floor levels, appropriate ground floor uses etc.) that need to be considered within the plan. Whilst this paragraph does reference 'environmentally sensitive drainage systems' which 'will also have wildlife benefits' we recommend that it is expanded to acknowledge the need to adapt to impacts of climate change on habitats and coastal change alongside flooding, noting the multi-functional benefits that could also be realised from NFM schemes, sustainable drainage systems (SuDS) and implementing coastal change management areas (CCMAs). These could include wildlife, water quality and recreational benefits.

For **Question 7** relating to carbon saving measures it should therefore also be noted that there are significant ecological restoration opportunities alongside carbon sequestration policies.

#### Chapter 7 - Promoting vibrant town centres

With regard to changes of use (**Question 15**) and in light of the recent changes to use classes and permitted development, it will be important for the Local Plan to consider whether changes from 'less vulnerable' uses to 'more vulnerable' uses such as residential can be appropriate in some areas at risk of flooding and therefore whether such proposals must be subject to the full planning application process rather than following the prior approval process.

#### Chapter 10 – Our outstanding natural environment

We note that this chapter appears to be dominated by discussion about landscape concerns and issues with little on biodiversity and none specifically on the water environment (rivers, estuaries and coastal waters). For example, the plan will need to consider the condition of the rivers as well as the presence of protected areas such as the Exe Estuary SPA and Ramsar site, Axe SAC/SSSI/MCZ or Otter Estuary MCZ. In respect of the River Axe we would assume the plan will carry forward the Axe Nutrient Management Plan requirements and work carried out thus far under the existing East Devon Local Plan.

It would be good for the plan to be aligned with the emerging statutory Local Nature Recovery (LNR) Strategies for Devon, Dorset and Somerset and with AONB Nature Recovery Plans.

Additional national environmental policy objectives that need to be considered in the new plan include:

- Supporting the delivery of the Axe SSSI River Restoration Plan.
- Supporting adaptation of infrastructure and communities to movement of the River Otter, and where possible support restoration of the river's natural function.
- Designation of a Coastal Change Management Area or equivalent to deliver adaptation of land use to support changes in the Exe Estuary SPA and Ramsar site in face of climate change, and also natural change at Dawlish Warren.
- Enabling naturalisation and connectivity for wildlife and natural processes along all watercourses.
- Embedding the Nature Recovery Network.

For **Question 20** we would support Option 1, to place significant restrictions on development in protected landscapes.

Paragraph 10.5, notes the recent changes that will require future development achieving a 10% net gain in biodiversity. Whilst we strongly support this requirement we recommend that plan consider whether a higher requirement (e.g. 20%) could be justified, especially in the most environmentally sensitive parts of the district.

**Question 21** asks which option would be best to achieve biodiversity net gain. The most pragmatic approach would be Option 4 which would allow for better consideration of Lawton principles (more, bigger, better and joined) and recognise that on-site provision is not always possible or optimal. In some cases a mixture of on-site and off-site provision will be most appropriate.

We are supportive of the 'other natural environment policy objectives' set out in paragraph 10.8, especially 1), 2), 3), 6), 7), 8) and 9). With regard to 10.8 9) which addresses 'increasing coastal erosion', we fully support the designation of Coastal Change Management Areas and would advocate a clear policy on where existing uses should be relocated to. Nonetheless, we recommend that this objective should also refer more generally to sea level rise, and the consequences of more frequent inundation and coastal squeeze.

The plan could also explore opportunities created through green financing.

#### Chapter 11 - Promoting sustainable transport

It is important that the plan promotes sustainable transport infrastructure which is resilient to flooding and coastal change, thereby maximising their operational efficiency.

#### Chapter 12 - Infrastructure and facilities

Whilst there is reference to flood management infrastructure within paragraphs 12.1 and 12.2 we recommend that this chapter should include more specifically on flood and coastal risk management (FCRM) infrastructure. At present FCRM infrastructure is delivered through a partnership funding approach with the proportion of flood defence grant in aid available to a project depending on the number of houses protected, economic impacts and environmental benefits. In Devon and Cornwall this approach means there is often a significant funding gap which needs to be bridged to ensure the infrastructure can be delivered.

The additional policy objectives set out under paragraph 12.9 do include a question (3) about accessing more money to bridge infrastructure funding gaps. It will be particularly important to consider how this will fit with potential changes in funding such as the National Infrastructure Levy which will create a nationally competitive environment for infrastructure funding. Match funding from other Government departments can provide a route to gaining more funding if projects align with shared objectives.

These policy objectives could also consider green finance options, currently being explored through the Natural Environment Investment Readiness Fund to provide revenue from ecosystem services.

It would also be prudent to consider foul drainage infrastructure requirements.

#### Chapter 13 - Developing a strategy for the distribution of development

It is essential that the strategy for distributing development is informed (as is implied in paragraph 13.14) by environmental constraints and the capacity of the local environment to accommodate more development. For example, the strategy should recognise the importance and value of the Strategic Flood Risk Assessment process in influencing the distribution of development. The environmental condition of the district's rivers and their ability to accommodate more treated sewage effluent and other pollutants will also be an important issue. For this reason, in answer to **Question 28** option 4 (an alternative approach) is likely to be the most appropriate approach.

With regard to the plan period (paragraph 13.20) we would recommend that the plan does consider development beyond 2040. This is especially important in light of the significant challenges presented by climate change.

#### **Sustainability Appraisal (SA) Scoping Report**

We have the following observations in respect of the SA scoping report:

Figure 25 – We recommend this is expressed in more active form so that it is clear what exactly the SA is appraising. For example, the measures in the first column should be posed as questions (i.e. Will the policy/proposal... increase biodiversity? / ...reduce flooding? / ...improve water quality? ...reduce greenhouse gas emissions?).

In 3.13 the River Axe is noted in the report as supporting rare fish. It should be upland to lowland rivers supporting floating vegetation, as well as the rare fish (Bullhead, brook and sea lamprey).

We recommend that 3.20 should refer specifically to the district's rivers and their drainage networks as well as wildlife more generally.

Threats to biodiversity (3.22) should include historic legacy impacts to rivers, including from infrastructure, dredging, and land management. Urbanisation impacts include limitations on the space for rivers and estuaries to naturally adjust and adapt to change.

The section on Climate Change adaptation does not appear to consider the natural environment response to climate change, and the need to give it space and support to adapt. This is relevant to the likes of the Exe Estuary SPA/Ramsar, but also the non-designated River Otter.

With regard to Coastal Flooding and erosion (3.46), there is reference to the Exe Estuary Strategy. However, the SA should review the relevance of this and update policies where necessary. For instance the Exe Estuary Strategy proposed managed realignment at Clyst. This has now been dropped and mitigation for short to medium term impacts on the estuary are to be delivered in the Otter Estuary, which was not explicitly included within the Strategy (only in its statement of case for the IROPI case).

The local Plan needs to consider adequate measures are in place for the lifetime of developments proposed within the plan.

The section on Water Quality of East Devon (3.57-3.62) does consider the rivers of the district. However, it only does this through the focus of water quality, not the physical form and function of the rivers that are also under pressure and key to supporting biodiversity and landscape value throughout the district.

By example, 3.60 considers the relevance of phosphate on the River Axe SAC, but not the considerations of the River Axe Restoration Plan. Evidence bases such as the Axe and Otter Fluvial Audits are liable to be overlooked. Impacts of the River Otter on infrastructure, and fish passage connectivity along the River Sid should also be considered.

These issues also follow through to Section 5 (defining sustainability objectives). For example, with regard to climate change there needs to be more than consideration of just flooding and coastal risks. Heat, drought and storm extremes will all stress both the natural and built environments.

Figure 30 (Local plans, policies and programmes) should refer to the River Axe Restoration Plan whilst the reference to River Basin Management Plan is out of date and should refer to the 2015 plan.

### **Duty to Cooperate**

The key issues to raise here is the fact that the boundary of East Devon District does not align with fluvial catchment boundaries and therefore cross boundary issues will have an impact upon the water environment and flood hydrology. The following list provides a summary:

- The Lym catchment is split between East Devon and West Dorset.
- The Upper Axe catchment originates in West Dorset and South Somerset.
- A small area of the Upper Otter catchment is situated within Taunton Deane.
- Small areas of the Upper Culm catchment are within East Devon, prior to draining into Mid Devon.
- East Devon encompasses an area of the Middle Exe between Silverton and Exeter, which will be influenced by the upstream catchment draining from Mid Devon.
- The designated Exe Estuary borders the west of East Devon.

Similarly biodiversity does not obey political and administrative boundaries. Therefore work with these local authorities and other stakeholders in these areas will be essential.

Influencing development and land management in upstream areas of East Devon's rivers can help to reduce adverse impacts on water quality (most importantly reducing Phosphate [organic and artificial] and silt inputs) and flooding. This is especially relevant for the River Axe, where it would be beneficial to reference the River Axe Restoration Plan and 'Triple Axe' Partnership Project to protect/enhance the River Axe SAC/SSSI and ultimately the Axe Estuary MCZ. This is also perhaps the most significant upstream influence for the area where opportunities for NFM will be available.

We would also recommend alignment with the emerging statutory LNR Strategies for Devon, Dorset and Somerset, the AONB Nature Recovery Plans, and both the Connecting the Culm and Crystal Clear Clyst projects.

Yours sincerely

**MARCUS SALMON**  
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Area Director  
Mark Prior

18 February 2021

Dear East Devon Planning Team,

### **Sustainability Appraisal East Devon**

Thank you for the opportunity to comment on the Sustainability Appraisal (SA) for East Devon. The Forestry Commission are a non statutory consultee and are the government's forestry experts. It is in that role that I respond.

### **Veteran Trees**

I am very pleased to see reference to ancient woodland within the SA. Could you please amend this section however to ensure it is expanded to also covers veteran trees. These are covered by the NPPF paragraph 175 and are afforded the same protection being irreplaceable, however due as they are generally found outside of woodland and are therefore more vulnerable to the impact of development.

### **Green Infrastructure**

The aim of the SA is in 'identifying sustainability issues' and the aim of the SEA is 'defining the environmental protection objectives'.

Whilst trees themselves are afforded protection the plan should also acknowledge the role that trees have in protecting against many of the other issues, and are therefore also part of the solution. So to help further meet these aims I would like to advise how many of the concerns raised in the plan will be mitigated by well-designed tree planting and woodland creation and this should be strongly favoured when considering new development consent.

The predicted impacts of Climate Change are well understood within the SA and development allows the opportunity to better plan the greenspaces around developments maximising natural benefits. Where tree planting is a key component of Green Infrastructure and required ecological net gain of development then trees and woodland can:

- Slow water in surface run-off
- Capture rainfall and prevent water even reaching ground
- Increase infiltration to ground water reducing flood risk
- Improve water quality by absorbing pollutants, thus locking up nitrates and phosphates (particularly important given declining condition of UK waters and local RAMSAR sites)
- Scrub air of pollutants, especially harmful particulates
- Provide summer shading and winter sheltering acting as 'nature's air conditioner'
- Be a key landscape component screening development
- Help AONB achieve deliver their objective to increase the wooded landscape (Colchester Declaration)
- Deliver the richest long term biodiversity component when considering biodiversity net gain
- provide robust recreational opportunities having a large carrying capacity of usage levels

- Capture Carbon faster than any other land use. Soil carbon increases most rapidly under woodland, if timber used then above ground carbon is also locked up.
- Provide sustainable construction material if well-managed

If well planned tree planting and woodland creation is required in new development the gains can be considerable and the opportunity should not be lost.

### **Flood risk**

The planting of new riparian and floodplain woodland can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland. The Forestry Commission is keen to work in partnership with stakeholders to develop opportunities for woodland creation to deliver these objectives.

### **Renewable & low carbon energy**

The resilience of existing and new woodland is a key theme of the Forestry Commission's work to Protect, Improve and Expand woodland in England. Woodfuel and timber supplies continue to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.

In the wider planning context the Forestry Commission encourages local authorities to consider [the role of trees in delivering planning objectives as part](#) of a wider integrated landscape approach. For instance, through the inclusion of [green infrastructure](#) (including [trees and woodland](#)) in and around new development; and the use of locally sourced wood in construction and as a sustainable, [carbon lean fuel](#).

We hope this information and the links to other resources will be helpful to you.

Yours faithfully,

Jon Burgess  
Local Partnership Advisor

# HISTORIC ENGLAND

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**From:** Harfield, Rebecca <Rebecca.Harfield@HistoricEngland.org.uk>  
**Sent:** 22 March 2021 17:55  
**To:** Planning Policy  
**Subject:** East Devon Local Plan 2021 to 2040 Sustainability Appraisal Scoping Report - Historic England  
**Attachments:** East Devon LP SA Scoping Report \_FINAL.pdf

Dear Sir or Madam

Thank you for your email below acknowledging receipt of Historic England's comments on the East Devon Local Plan 2021 to 2040 Issues & Options Consultation and the Duty to Cooperate.

As we mentioned in our email below and in our written response, we unfortunately did not have the capacity to comment on the Sustainability Appraisal Scoping Report within the consultation period but undertook to do this as soon as possible. We have now prepared our comments and these are attached to this email in what is Appendix 2 to our original consultation response letter, dated 15 March 2021.

As you will see from our comments, we have questioned the robustness of the historic environment baseline information in the Scoping Report, which we consider should be addressed in the preparation of a Heritage Topic Paper. In our view, this could provide the evidence base for both the Sustainability Appraisal and the new Local Plan. We have also made a number of suggested changes to key sustainability issues and objectives. We hope these can be addressed in the next stage of the SA's preparation.

Please do not hesitate to contact me if you any queries about our comments or would like to arrange a meeting.

Kind regards

Rebecca

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**From:** Planning Policy <PlanningPolicy@eastdevon.gov.uk>  
**Sent:** 17 March 2021 14:26  
**To:** Harfield, Rebecca <Rebecca.Harfield@HistoricEngland.org.uk>

**Subject:** RE: East Devon Local Plan 2021 to 2040 Issues & Options Consultation, Sustainability Appraisal Scoping Report & Duty to Cooperate - Historic England

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**From:** Harfield, Rebecca <[Rebecca.Harfield@HistoricEngland.org.uk](mailto:Rebecca.Harfield@HistoricEngland.org.uk)>

**Sent:** 15 March 2021 11:25

**To:** Planning Policy <[PlanningPolicy@eastdevon.gov.uk](mailto:PlanningPolicy@eastdevon.gov.uk)>

**Subject:** East Devon Local Plan 2021 to 2040 Issues & Options Consultation, Sustainability Appraisal Scoping Report & Duty to Cooperate - Historic England

Dear Sir or Madam

Thank you for consulting Historic England on the East Devon Local Plan 2021 to 2040 Issues & Options Consultation, Sustainability Appraisal Scoping Report and Duty to Cooperate. Please find our response attached to this email.

As you'll see from our letter, we have unfortunately not had the capacity to comment on the Sustainability Appraisal Scoping Report in the consultation period. We apologise for this and will provide our comments on this as soon as we can in what will be Appendix 2 to our letter.

In our response, we have signalled some matters where we would appreciate early discussions with the Council, mostly regarding the historic environment evidence base for the new local plan. In the meantime, please do not hesitate to contact me if you any queries about our comments or would like to arrange a meeting.

Kind regards

Rebecca

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## Appendix 2: Historic England Comments on the Sustainability Appraisal & Strategic Environmental Assessment Draft Scoping Report for East Devon Local Plan 2021-2040 – January 2021

Task	Support/Object/Comment	Comments and suggested changes
<p>Task A1 – Policy context – other relevant plans, policies and programmes</p> <p>And</p> <p>Appendix 1</p> <p>And</p> <p>Figure 30</p>	Support/Comment	<p>Historic England welcomes the inclusion of legislation, national policy and local policy, plans and programmes relevant to the conservation and enhancement of the historic environment.</p> <p>We have a number of minor suggested corrections as follows:</p> <ul style="list-style-type: none"> <li>National Heritage Protection Plan (English Heritage, 2012) – please note that that this was replaced by Heritage 2020 by the <a href="#">Historic Environment Forum</a>.</li> <li>Heritage at Risk 2015 / South West (Historic England) – this is updated annually and should be replaced with a reference to the latest 2020 <a href="#">version</a>.</li> </ul> <p>We also have a number of suggested additions as follows:</p> <ul style="list-style-type: none"> <li>UNESCO World Heritage Convention</li> <li>European Landscape Convention</li> <li>The Convention for the Protection of the Architectural Heritage of Europe</li> <li>The European Convention on the Protection of Archaeological Heritage</li> <li>Ancient Monuments &amp; Archaeological Areas Act 1979</li> <li>Planning (Listed Buildings and Conservation Areas) Act 1990</li> <li>Marine and Coastal Areas Act 2009</li> <li>Countryside and Rights of Way Act 2000</li> <li>Planning Practice Guidance – Historic Environment (last updated 2019)</li> <li><a href="#">HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment</a> (December 2016)</li> <li><a href="#">HEAN 3: Site Allocations</a> (October 2015)</li> <li>South Inshore and Offshore Marine Plan (2018)</li> <li>Jurassic Coast Partnership Plan 2020-2025</li> <li>East Devon Heritage Strategy (2019-2031)</li> <li>Adopted conservation area appraisals and management plans</li> <li>Guide to the Listing of Local Heritage Assets in East Devon (2019)</li> <li>East Devon List of Local Heritage Assets (2020).</li> </ul>
<p>Task A2 - Collecting Baseline Information</p> <p>The landscape and seascape of East</p>	Support in part/Object in part/Comment	<p>Historic England welcomes the much of the text in relation to landscape and seascape of East Devon. It should be noted, however, that there are inter-relationships between landscape, seascape, townscape and the historic environment, which could be more explicitly highlighted. For example:</p> <ul style="list-style-type: none"> <li>The National Planning Policy Framework (NPPF) 2019 states that the conservation and enhancement of cultural heritage is an important consideration in AONBs. We also note that the Landscapes Review</li> </ul>



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Devon		<p>(2019) included a proposal to make the purpose of AONBs explicitly include cultural heritage.</p> <ul style="list-style-type: none"> <li>Registered parks and gardens are areas of designed landscape but are also designated heritage assets.</li> <li>Landscapes, townscape and seascapes often form the settings of heritage assets, as well as being of importance in their own right.</li> <li>The presence and density of heritage assets along East Devon's coastline could be usefully acknowledged, which include the Jurassic Coast World Heritage Site (a designated heritage asset).</li> <li>The concept of seascape could be usefully explained with links to <a href="#">seascape character assessment</a>.</li> </ul> <p>We note mention of some issues and threats affecting landscape and coastline. In our view, however, this is not sufficient information to provide an up-to-date and robust evidence base for identifying sustainability issues, predicting and monitoring likely effects and assessing alternative solutions in preparing the new local plan. Further information can be found in <a href="#">HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment</a> (2016).</p>
<p>Task A2 - Collecting Baseline Information</p> <p>Historic environment, built heritage and design quality</p>	<p>Support in part/Object in part/Comment</p>	<p>Historic England welcomes the inclusion of this section on the historic environment, built heritage and design quality. However, we do not consider that this provides sufficient information to provide an up-to-date and robust evidence base for identifying sustainability issues, predicting and monitoring likely effects and assessing alternative solutions in preparing the new local plan. We offer the following comments and suggested changes:</p> <ul style="list-style-type: none"> <li>The title and text focus on built heritage but should cover all heritage asset types as well as explaining that their settings can also positively contribute to their significance.</li> <li>It should acknowledge that heritage assets are an irreplaceable resource and the statutory duties and national policy requirements in respect of their conservation and enhancement (see chapter 16 of the NPPF 2019).</li> <li>The text should explain the difference between designated and non-designated heritage assets (note the word 'un-designated' should not be used given the terms used in the NPPF).</li> <li>The table at Figure 4 should provide the information source(s) and dates for this data. Information on designated heritage assets excluding conservation areas can be found in Historic England's Local Authority Profiles 2020 for East Devon (see <a href="#">Heritage Counts Indicator Data</a>).</li> <li>The table in Figure 4 should also seek to provide information on non-designated heritage assets including buried, waterlogged archaeological and paleoenvironmental remains of significant interest. Information can be obtained from the Devon Historic Environment Record, the <a href="#">Intertidal and Coastal Peat Database</a> and the Council's own website for the East Devon List of Local Heritage Assets (2020).</li> <li>No information is presented on heritage at risk through neglect, decay and other threats and the reasons for this. Historic England maintains a Register of <a href="#">Heritage at Risk</a> that is updated annually. Please note that our Register does not cover all types of designated heritage asset and does not consider non-designated heritage assets. Your local authority conservation and archaeology advisers should be able to provide further information about other heritage at risk.</li> <li>Little effort seems to have been made to identify the current and likely future condition of East Devon's</li> </ul>



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		<p>historic environment, threats as well as opportunities related to the conservation, enhancement and enjoyment of heritage assets, areas that may be particular sensitive to development. In addition to keeping assets in ongoing use and management and their vulnerability to poor quality and inappropriate works and activities, obvious examples of opportunities and threat include mitigation and adaptation to <a href="#">climate change</a>, <a href="#">coastal erosion</a> and <a href="#">flooding</a>, the challenges facing historic <a href="#">high streets and town centres</a> and the relationship between the historic environment and individual and community <a href="#">health and wellbeing</a>.</p> <ul style="list-style-type: none"> <li>• Further information will also be available in conservation area character appraisals and management plans, as well as in the adopted East Devon Heritage Strategy.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>Your local authority conservation and archaeology staff would be well-placed to help you address these points. Further information can be found in <a href="#">HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment (2016)</a>.</p> <p>Given this and in light of our comments in our response to the East Devon Local Plan (2021-2040) Issues and Options Consultation (dated 15 March 2021), we consider that a Heritage Topic Paper should be prepared to address these matters. This would provide an up-to-date evidence base for sustainability appraisal and the local plan itself as required by paragraphs 31, 32 and 35 of the NPPF 2019.</p>
Task A3 – Identifying key sustainability issues	Support/Comment	<p>Historic England welcomes the inclusion of Landscape, Historic and built environment and Quality of new development as sustainability issues in Figure 24.</p> <p><b>Landscape:</b> we consider this should be broadened to cover seascape and townscape given the baseline information collated in Task A2.</p> <p><b>Historic and built environment:</b> we consider that that this should be broadened to cover all types of designated and non-designated heritage assets as it comes across as focussed on built heritage.</p> <p><b>Quality of new development:</b> we consider that this should recognise the positive contribution that heritage assets can make to local character and distinctiveness and to high-quality development.</p> <p>Without addressing our comments on the baseline information above, however, the summary commentary and likely future trends without a new local plan cannot be considered to be robust. Further information can be found in</p>



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		<a href="#">HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment</a> (2016).
Task A4 – Defining sustainability objectives	Support/Comment	<p>Historic England welcomes the inclusion of the following sustainability objectives in Figure 25 subject following changes:</p> <p><b>2. Landscape:</b></p> <ul style="list-style-type: none"> <li>• delete 'our natural environment' from the objective to recognise the historic character of landscapes and seascapes (please see <a href="#">Heritage and the Environment</a>)</li> <li>• include a reference to seascape character in factors</li> </ul> <p><b>3. Historic and built environment:</b></p> <ul style="list-style-type: none"> <li>• delete 'built and historic assets' and replace with 'heritage assets' in the objective</li> <li>• include reference to World Heritage Site, Registered Parks and Gardens and locally listed heritage assets in first bullet point in factors</li> <li>• incorporate a new bullet point that seeks to address heritage at risk as a factor</li> <li>• reword the second bullet point in factors as follows: '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'</li> <li>• reword the third bullet point in factors as follows: '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'</li> <li>• include a new bullet point that focusses on the enjoyment of the historic environment given paragraph 185 of the NPPF 2019.</li> </ul> <p>There may be other factors to add into Sustainability objective 3 when more up-to-date and relevant historic environment baseline data is available.</p> <p>We also consider that the factors should recognise the holistic nature of the historic environment and its inter-relationships with other Sustainability objectives. For example, Historic England considers that <a href="#">climate change</a> is one of the most significant and fastest growing threats to people and their cultural heritage but that looking after and learning from the historic environment contributes positively to overall sustainability and can help with <a href="#">climate change mitigation and adaptation</a>. We believe that energy efficiency, sustainable technology and reducing carbon emissions are compatible with the conservation of our heritage (Sustainability objectives 4 and 5). Another example is town centres, most of which are historic, are conservation areas and contain many heritage assets (Sustainability objective 13). Further information can be found in <a href="#">HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment</a> (2016).</p>



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# NAOME GLANVILLE

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**From:**  
**Sent:** 08 March 2021 21:49  
**To:** Planning Policy  
**Subject:** Sustainability Appraisal Scoping Report

Dear East Devon Planning Department

I would like to comment, under the consultation for the Sustainability Appraisal Scoping Report and ask you to take the points below into account, which relate to the pages in the report:

Page 14: 'Wildlife more Generally' - We are very lucky to have both otters and beavers in the River Otter. Please can this be given a special mention as I would like to see any decisions about development under the local plan be taken with the protection of wildlife in rivers, river banks and river meadows in mind. The beavers have particularly been mentioned on the national news and they are of interest as a natural 'amenity' for both residents and visitors.

Page 32: 'Noise' - A very significant noise blight across East Devon is the A30 which is surfaced with concrete. When it was opened (in around the year 2000?) the local population was assured that it would be surfaced with tarmac within 10 years. This has never happened and I would like to see East Devon District Council a) acknowledging that it creates noise pollution in its current state, b) that it should be an objective to lobby for it to be resurfaced in tarmac and c) ensure that any further roadbuilding of the A30 eg the proposed new section of road going out to the Blackdown Hills should be surfaced in tarmac to minimise noise pollution. East Devon should not accept second best!

Page 53: No's 1 (Biodiversity) and 2 (Landscape) - The value of biodiversity and landscape should be acknowledged as something that should be preserved not just for the enjoyment of residents of East Devon but because it is a precious resource for visitors to enjoy, many of whom come to East Devon to escape from cities and other built up areas to our 'green lung'. Additionally biodiversity (or lack of it) in East Devon affects the planet - birds and insects migrating here from other places in the world can be affected by plans humans make for East Devon. We should not just preserve biodiversity in AONB's but acknowledge that all environments have a part to play in sustaining biodiversity and we should take this into account in our plan.

It would also be great if East Devon could encourage more tree-planting  
- either by grants, or if no money is available, via campaigns - eg social media or newsletters.

Page 53: Sustainability Objectives - No 4 'Climate Change and Carbon Emissions'. Since the Covid Pandemic, the working world has changed and it has been proven that with new technology more people can work more of the time from home. I think East Devon District Council should include the objective of encouraging businesses and workers to espouse the idea of more home working wherever possible. This would reduce carbon emissions and also reduce the need for building more office space on green fields. This could also help increase employment opportunities for people for whom public transport is lacking, in many of the East Devon villages.

Yours sincerely

Naome Glanville



# NATURAL ENGLAND

Date: 15<sup>th</sup> March 2021  
Our ref: 340469  
Your ref: Review of East Devon Local Plan 2013-2031



Mr M Dickins  
Planning Policy  
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## BY EMAIL ONLY

Dear Mr Dickins

### **Review of East Devon Local Plan 2013-2031 – Issues and Options report, Housing and Economic Land Availability Assessment and Sustainability Appraisal Scoping Report**

Thank you for your consultation dated and received by Natural England on 19<sup>th</sup> January 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have considered the three Local Plan Review documents – the Issues and Options report, the HELAA and the SA Scoping report - and welcome the opportunity to provide input to the process at this early stage. Natural England has the following comments to make, these are in addition to the comments made on the Duty to Cooperate consultation held in December 2020.

#### **Issues and Options report – Jan 2021**

##### **Objectives, Scope and background**

Local Plans and their reviews should be based on a relevant and up-to-date environmental evidence base. Annex A provides a list of sources of evidence which may be useful in ensuring the East Devon Local Plan is evidence based, in line with paragraph 31 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation, such as the Green Infrastructure Strategy for Towns and the Open Space Strategy that the current Local Plan identified a need for.

##### **Designing for health and wellbeing**

Natural England would welcome the preparation of a robust and up-to-date assessment of the needs for open space, and opportunities for new provision, to support the achievement of this objective through Local Plan policy. The plan should make provision for an appropriate quality and quantity of green space to meet identified local needs, and to remedy any deficiencies, as part of wider open space provision.

The plan should recognise the value of the natural environment to health and wellbeing, including

through seeking to protect and enhance public rights of way and open access land, and by improving public access to and enjoyment of the coast. The plan could include policy to support the creation and maintenance of the current and future route of the National Trail around the coast of England.

### Tackling the climate emergency

Natural England welcomes the inclusion of this section in the emerging Local Plan and, as per our earlier comments, recommends that the clear need for policies to address the impacts of climate change on the natural environment are recognised in this chapter.

If the intention is to identify suitable areas for renewable and low carbon energy developments in the Plan then it will be necessary to prepare an appropriate evidence base to support those proposals. This would include an assessment of the capacity of the natural environment (landscape and biodiversity) to accommodate renewable and low carbon energy developments and their associated infrastructure.

The Issues and Options report also recognises the need to adapt to the impacts of climate change. In addition to adapting to flooding, as identified in the report, there may also be a need to implement other adaptation measures, such as but not limited to:

- identifying appropriate policies on coastal change that work with natural coastal processes;
- recognising the role of green infrastructure in climate change adaptation;
- enabling the natural environment to adapt to climate change by identifying a local nature recovery network;
- identifying opportunities for new (or improved connectivity to existing) multi-functional green and blue infrastructure;
- requiring public spaces to be more wildlife friendly and climate resilient;
- requiring the planting of street trees in new developments, characteristic to the local area, to make a positive contribution to urban cooling; and
- requiring schemes to be designed to encourage wildlife.

These are examples of nature based solutions that act to help adapt to climate change but they also offer opportunities for environmental gains, and any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

### Meeting housing need

In accordance with paragraph 171 of the NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. In order to identify potential impacts on designated sites the Authority is advised to use our Impact Risk Zones (available from Magic Map) in assessing their site allocation options.

Site allocation policies should seek opportunities to incorporate biodiversity within the developments.

### Supporting jobs and the economy

Our comments set out in the paragraph above, relating to the selection of housing allocation sites, apply equally to the selection of site allocations for employment and economic uses.

Natural England would welcome the inclusion of text in the Plan that reflects an understanding of the value of the natural environment to the local economy and seeks to maximise the delivery of green growth while avoiding or minimising costs to the natural environment.

Site allocation policies should seek opportunities to incorporate biodiversity within the developments.

### Designing beautiful and healthy spaces and buildings

The Local Plan should contain policies that require high quality design and recognise the role of the natural environment in delivering local distinctiveness and sense of place. The Government are currently consulting on revisions to the NPPF to implement policy changes in response to the Building Better Building Beautiful Commission's 'Living with Beauty' report. The proposed changes recognise the contribution that the presence of greenery makes to the beauty of a place, and the proposed changes to the NPPF include a requirement for plan policies to ensure that new streets are tree-lined.

### Our outstanding natural environment

#### **Protected Landscapes**

Natural England would welcome Local Plan policies that provide protected landscapes (Areas of Outstanding Natural Beauty in this case) with the highest levels of policy protection in relation to conserving and enhancing their landscape and scenic beauty.

The plan should set out clear criteria for appropriate development within or impacting on AONBs, including the major developments test set out in footnote 55 of the NPPF for development within protected landscapes. The criteria should consider the nature, scale, location, setting and standards of design for such developments.

In addition, the Plan should take account of the character and distinctiveness of different areas; it should recognise the intrinsic character and beauty of the countryside; it should consider the appropriate protection of locally valued landscapes; and it should, where appropriate, identify and protect areas of tranquillity.

#### **Biodiversity Net Gain**

Natural England are pleased to note that the Issues and Options report acknowledges the Government's commitment to introduce mandatory Biodiversity Net Gain. It is expected that the Environment Bill, when enacted, will set out the timeline for when and how the mandatory net gain will be implemented. Natural England welcomes the proposed interim approach being developed by East Devon District Council and advises that the combined approach is likely to be more consistent with the emerging National approach. However, the Authority might like to consider the priority which each option is given, with onsite delivery of net gain being the preferred option. It might also be necessary to consider how the local tariff will operate alongside the National Biodiversity Credits scheme, if and when it is introduced.

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) highlights the role of policies and decision making in '*minimising impacts on and providing net gains for biodiversity*' (para 170).

Planning Practice Guidance describes net gain as an '*approach to development that leaves the natural environment in a measurably better state than it was beforehand*' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, Defra's Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

Natural England focusses our advice on embedding biodiversity net gain in development plans, since

the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies.

### **Designated Sites and HRA**

Natural England advises that the Plan should include the following recommendations:

- set criteria based policies for protected biodiversity or geodiversity sites or landscape areas, distinguishing between international, national and local sites;
- make clear how specific impacts from new development (e.g. recreational disturbance from new housing and deterioration in water quality) will be addressed;
- set a strategic approach to biodiversity which embeds the principle of avoiding impacts and sets out the mitigation hierarchy for when impacts can't be avoided; and
- map designated sites so they can be clearly identified in the context of proposed development allocations and policies for development

Our comments made in the previous Duty to Cooperate consultation (Dec 2020), relating to the review of the South East Devon European Sites Mitigation Strategy; the amended Habitats Regulations; the Nutrient Management Plan for the River Axe SAC; and the air quality guidance, still apply.

### **Priority Habitats and Protected Species**

Para. 174 of the NPPF states that Plans should '*promote the conservation, restoration and enhancement of priority habitats, ... and the protection and recovery of priority species*'.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available [here](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected by law. Further information can be found [here](#). Sites containing watercourses, old buildings, significant hedgerows, old mines, caves, heathland, grassland, ponds, previously developed land, woodland or substantial trees (to name a few) are possible habitats for protected species.

### **Marine Conservation Zones**

The Otter Estuary Marine Conservation Zone and the Axe Estuary Marine Conservation Zone are within the East Devon District boundary. The Local Plan review should consider the inclusion of planning policy relating to the appropriate consideration of MCZs and the need for MCZ assessments, where applicable.

### **Networks of Biodiversity and the Local Nature Recovery Strategy**

Para. 174 of the NPPF states that Plans should '*identify, map and safeguard*' and '*promote the conservation, restoration and enhancement*' of [ecological networks](#). This should include any proposed opportunities for habitat enhancement, restoration or creation in the local nature recovery strategy, and will require the authority to work collaboratively with the Devon Local Nature Partnership and adjoining authorities. The Plan should specify the types of development that may be suitable within each of the Nature Areas identified through the LNRS.

### **Green Infrastructure**

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by a Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the

Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

Natural England welcomes the suggested approach of designating Local Green Spaces in the Local Plan and advises that the development of the policies and their evidence base should be consistent with paras. 99 to 101 of the NPPF which requires the designations to complement investment in sufficient homes and jobs; be demonstrably special and local in character; and requires the policies for managing development within the designated areas to be consistent with those for Green Belts.

### **Ecosystem Services and Natural Capital**

To be consistent with para. 170 of the NPPF, the Local Plan should set out policies that demonstrate recognition of the economic and wider benefits from Devon's natural capital assets and the ecosystem services they provide. In addition, there should be a plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries (para. 171).

Natural England have prepared a [Natural Capital Atlas](#) for Devon, which maps out key properties of the environment to show how much, how good and where your natural capital assets are, and may be a useful source of data as you continue preparing evidence to support the new Local Plan.

### **Soil, Geology and Agricultural Land**

Large areas of the East Devon District are rural in nature. Post-1998 ALC surveys have identified some of the areas of Best and Most Versatile agricultural land within East Devon and, for strategic planning purposes only, Natural England have prepared [Likelihood of Best and Most Versatile Agricultural Land strategic scale maps](#) for each of the English regions.

The Plan should recognise the economic and other benefits of the best and most versatile agricultural land and seek to safeguard its long term capability. Plan policies will make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land.

The Local Plan, as described in para. 170 of the NPPF, should set out policies that protect and enhance sites of geological value and soils. The evidence base supporting the Local Plan should set out how impacts on soils and geological conservation have been considered. Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

### **Ancient woodlands**

Where a plan area contains irreplaceable habitats, such as ancient woodland, and ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland, and ancient and veteran trees.

### **Coastal issues**

Natural England supports the retention of a Local Plan policy which protects the character of the undeveloped coast and seeks to protect and enhance its distinctive landscape and seascape.

The Local Plan proposals map should identify the East Devon Heritage Coast, and any policies developed to guide development proposals within the defined Heritage Coast area should be consistent with para. 173 of the NPPF.

### **Air Quality, Water Quality, Light Pollution and Noise Pollution**

Natural England supports the retention of Local Plan policies which consider the strategic impacts on water quality; water resources; air quality; noise pollution; and light pollution; and which address flood risk management.

Where specific environmental issues have the potential to impact sensitive wildlife sites, Natural England recommends the preparation of planning guidance to support the implementation of the relevant policies.

### **General comments on the natural environment**

The Local Plan should contain a clear strategy for protecting and enhancing the natural environment, which sets out the general principle of firstly avoiding harm, then mitigating, and as a last resort compensating for adverse impacts on biodiversity.

In particular, the Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), Habitats sites (Special Areas of Conservation and Special Protection Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Issues and Options report identifies 10 natural environment issues to be addressed in the new Local Plan, and Natural England supports the exploration of all of them. In addition, Natural England recommends that each of the other issues raised in this letter, and the previous letter, are also addressed, namely the review of the South East Devon European Sites Mitigation Strategy in light of revised housing numbers; the implementation of the Nutrient Management Plan for the River Axe SAC; and the adoption of air quality guidance to support good decision-making.

### Promoting sustainable transport

Transport policies (including any proposed transport infrastructure) should take full account of impacts on the natural environment and should have a positive impact on the delivery of the plan's environmental policies.

Paragraph 11.1 of the Issues and Options report identifies the multiple benefits to promoting sustainable transport. In addition to those listed, it should be noted that another of the benefits is the improved access to nature, which also improves mental health and embeds public appreciation for and understanding of the value of nature.

### Developing a strategy for the distribution of development

Natural England advises that, for whichever spatial strategy is progressed, the strategy should be appropriately justified; the sites proposed for development should be those with the least environmental or amenity value; and areas that are inappropriate for development should be safeguarded.

## **Housing and Economic Land Availability Assessment**

We recognise that HELAAs form a critical component of the evidence base for Local Plans. In order to allocate the most appropriate sites to deliver high quality, sustainable development; environmental issues and opportunities should be considered as an integral part of the assessment process.

Natural England does not have available staff resources to provide bespoke advice on LAAs or attend meetings in connection with them. In line with the National Planning Policy Framework, we offer the following generic advice on key natural environment considerations for use in producing or revising LAAs, which we hope is of use.

### **1. Landscape**

#### **Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes.**

Impacts of new housing upon landscape may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.

The assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. These update the national framework of Joint Character Areas and Countryside Character Areas that are used to inform LCAs. Further information is available at [NCAs](#)

Landscape Character Assessments (LCAs) identify the different landscape elements which give a place its unique character and can help inform the location and design of new development. Further information on LCAs is at [Landscape Character Assessment](#).

More detailed study (e.g. Landscape and Visual Impact Assessment) of the sensitivity of the landscape and capacity to accommodate change may be necessary to determine the suitability of potential housing sites, particularly those within or near protected landscapes.

### **2. Biodiversity**

#### **Avoiding harm to the international, national and locally designated sites of importance for biodiversity.**

International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites<sup>1</sup>. National sites include biological Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs), Local sites are Local Wildlife Sites (a variety of other terms are also in use).

The potential impacts of new housing upon such sites may be positive or negative, direct or indirect and short or long term. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.

Indirect impacts may be experienced several kilometres distant from new housing e.g. water pollution. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.

Impact Risk Zones (IRZs) are a GIS tool that can be used by LPAs to consider whether a proposed development (or allocation) is likely to affect a SSSI. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Information about using this data can be found [here](#).

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<sup>1</sup> The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

The [Magic](#) website is a useful source of information on the location and qualifying features of the international and national designations. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.

### **Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations**

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here [UK BAP priority species and habitats](#).

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.

Priority habitats can be found on the Nature on the Map website referred to above. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these.

It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species. More information is available here [Phase 1 Habitat Survey](#).

### **Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement**

Where Nature Improvement Areas (NIAs) are identified they can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs the potential to contribute to habitat enhancement should be considered. Further information on NIAs is available here [NIAs](#).

Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Further information through the UK BAP link above.

### **Seeking opportunities to enhance and create Green Infrastructure**

Green infrastructure is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification. Green infrastructure maintains critical ecological links between town and country.

The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development.

### 3. Geological conservation

#### **Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites).**

The Nature on the Map website referred to above is a useful source of information on the location and qualifying features of geological SSSIs. Local Environmental Records Centres should also be of assistance and often hold information on Local Geological Sites.

Housing development may present opportunities for the enhancement of geological sites e.g. exposure sites in road cuttings. Further information on geological conservation is available on the Natural England website here [Geodiversity](#).

#### **Seeking opportunities to contribute to landscape restoration and enhancement.**

The NCAs profiles identify potential opportunities for positive environmental change. LCAs also identify opportunities for landscape restoration and enhancement. These can help identify potential opportunities for housing developments to contribute to landscape enhancement in an area.

### 4. Best and Most Versatile Agricultural Land

#### **Avoiding Best and Most Versatile Agricultural Land**

Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC). ALC maps are available on the [MAGIC](#) website. Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Further information is available here [ALC](#).

### 5. Public rights of way and access

#### **Seeking opportunities to enhance public rights of way and accessible natural green space.**

Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails. More information is available here [National Trails](#).

Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Existing open space should not be built on unless the tests of NPPF para 97 have been met. Open space is construed in the NPPF as all open space of public value which offer important opportunities for sport and recreation and can act as a visual amenity.

## **Sustainability Appraisal Scoping Report**

As statutory consultee under Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) we are providing advice in relation to the proper legal application of these regulations in particular, with a view to protection and enhancement of the natural environment. Natural England are also keen to contribute in a manner that sees the SEA process adds real value to the Plan development process.

### **Task A1 – Policy context**

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- Shoreline management plans
- Coastal access plans
- River basin management plans
- AONB management plans.
- Relevant landscape plans and strategies
- Emerging South West Marine Plan
- Devon Climate Emergency Plan
- Water Resource Management plans
- Emerging Environment Bill

### **Task A2 – Baseline information**

Existing environmental evidence can be gathered from various sources including online data sources like MAGIC, Local Environmental Record Centres (LERCs) and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping.

Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA). This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities, local nature partnership and the local enterprise partnership.

The relationship between environmental assets and key strategic growth areas may help to highlight potential opportunities that development could bring for the natural environment. The following may also be useful when considering biodiversity priorities in your plan area:

- What biodiversity currently exists, what is vulnerable or declining?
- How are existing assets connected, are there opportunities to fill gaps and improve connectivity?
- How does the above relate to neighbouring authority areas, can you work collaboratively to improve links between assets or take strategic approaches to address issues or opportunities?

Please see the attached annex for our advice on sources of local plan evidence on the natural environment.

### **Task A3 – Key sustainability issues**

No comment.

#### **Task A4 – Sustainability objectives**

*Biodiversity* – to reduce the creation of islands of biodiversity it would be advisable to 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.

It will also be necessary, when using the SA Framework to assess the sustainability of the plan, to consider the possible impact pathways between the features likely to be introduced by the policy being assessed and the habitats and species that may be affected, and to not just consider proximity in the appraisal.

This SA objective could include a commitment to deliver biodiversity net gain, which can then be tested as the plan develops.

*Landscape* – 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.

*Land resources* – 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.

*Health and activity* – 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.

#### **Task A5 – Scope of the SA**

The SA Framework should include relevant indicators to monitor the potential significant environmental effects of implementing the plan. Suitable monitoring can provide a much better understanding of the impacts of development on the natural environment, raise the status of the natural environment amongst decision makers, and provide much greater accountability and transparency. The proposed indicators should relate to the effects of the plan and not wider change.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of net biodiversity habitat delivered through strategic site allocations.
- Amount of new development in AONB/Heritage Coast with commentary on likely impact.
- Percentage of the district's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

We would be happy to work with the Council to help ensure a suitable indicator set is developed.

For any queries relating to the specific advice in this letter only please contact Stephanie Parker-Stephenson on 07799438517 or [stephanie.parker-stephenson@naturalengland.org.uk](mailto:stephanie.parker-stephenson@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Stephanie Parker-Stephenson  
Lead Adviser  
Sustainable Development - Devon, Cornwall & Isles of Scilly

## **Annex A - Sources of local plan evidence on the natural environment**

The following sources of evidence may be useful in ensuring local plans are evidence based, in line with paragraph 165 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation.

### ***General natural environmental evidence***

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan.

Natural England has also published downloadable natural capital maps. These are a suite of ten maps, of different aspects of natural capital, contributes to our understanding of where our natural capital is.

The Magic website will provide you with much of the **nationally held natural environment data** for your plan area in downloadable GIS format. Specific data sets are listed under the environmental topics below.

Local environmental record centres may hold a range of additional information on the natural environment, principally ecological.

The following local organizations may also hold environmental information where applicable: Local Nature Partnerships, Wildlife trusts, Areas of Outstanding Natural Beauty, and Nature Improvement Areas.

Evidence relating to the **significant environmental effects of the current local plan** should be available (in line with SEA legislation), as should suitable biodiversity evidence for any plan adopted after the NPPF came into effect (27 March 2012), usually through the current plan's Annual Monitoring Report.

### ***Landscape***

The Magic website provides data on the extent of protected landscapes (**National Parks and Areas of Outstanding Natural Beauty**).

**National Park/Area of Outstanding Natural Beauty Management Plans** may also be a source of useful evidence. These are usually found on these organisations' websites.

Most areas have local **landscape character assessments**. These are tools to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area.

Data on **tranquillity** is held by CPRE. They also hold mapping data on light pollution.

## ***Biodiversity and geodiversity***

The most relevant layers on Magic for you to consider are **Ancient Woodland, Local Nature Reserves, Priority Habitat Inventory, Sites of Special Scientific Interest** (including their **impact risk zones**), **Special Areas of Conservation, Special Protection Areas, and Ramsar Sites** (including, where relevant, marine designations).

You may also wish to draw on more detailed information on specific **Sites of Special Scientific Interest** and the **Conservation Objectives** and **Site Improvement Plans** for **Special Areas of Conservation** and **Special Protection Areas**.

**Priority habitats and species** are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Larger areas of priority habitat will usually be mapped either as **Sites of Special Scientific Interest** on the Magic website or as **Local Wildlife Sites or Local Geological Sites**. **Local wildlife site** data is usually held by local planning authorities themselves as is **local geological site** data. Local Environmental Record Centres and local wildlife and geo-conservation groups are also a source of information on Local Sites.

Natural England maintains the **Open Mosaic Habitat on Previously Developed Land Inventory** (a priority habitat dataset currently not integrated into the Priority Habitat Inventory on Magic) and is available on request from Natural England via email; [NaturalEnglandGIDataManagers@naturalengland.org.uk](mailto:NaturalEnglandGIDataManagers@naturalengland.org.uk).

**Local Biodiversity Action Plans** (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area. Local Geodiversity Action Plans (LGAPS) identify agreed local action for geodiversity, a list of active LGAPs can be found at UK Geodiversity Action Plan (<http://www.ukgap.org.uk/getting-involved/lgaps.aspx>).

Some areas have identified **Biodiversity Opportunity Areas** or similar for spatially targeting biodiversity restoration work.

**Protected species** are those species protected under domestic or European law. Local environmental record centres are likely to hold much of the available data on such species.

APIS holds data on air pollution in particular in relation to protected nature conservation sites.

## ***Access***

The Magic website holds the following access related data: **National Trails, Public Rights of Way (on the Ordnance Survey base map), Open Access Land (the Countryside and Rights of Way Act 2000 layer), together with national and local nature reserves, country parks** and the **England Coast Path**.

Locally held data will include the **definitive Public Rights of Way**, and may include **Rights of Way Improvement Plans** where they exist, and any locally mapped **open space audits or assessments**.

Natural England's work on Accessible Natural Greenspace Standards (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

## ***Green infrastructure***

Green infrastructure strategies may comprise or contain useful evidence sources where they exist.

## ***Soils***

A provisional Agricultural Land Classification (ALC) map is on Magic, and the GIS layer 'Likelihood of Best and Most Versatile Land' is available on request from Natural England via email; [NaturalEnglandGIDataManagers@naturalengland.org.uk](mailto:NaturalEnglandGIDataManagers@naturalengland.org.uk).

Some areas already have detailed ALC maps. The coverage of existing detailed MAFF post 1988 ALC surveys is shown on Magic. The MAFF post 1988 ALC survey reports and maps themselves are available from Natural England or from Gov.UK.

Our publication Agricultural Land Classification: protecting the best and most versatile agricultural land may also be of help.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic website and also from the Land IS website, which contains more information about obtaining soil data.

### ***Climate change***

The Climate Change Adaptation Manual provides evidence to support nature conservation in a changing climate.

The National Biodiversity Climate Change Vulnerability Assessment Model provides a spatially explicit assessment of the relative vulnerability of priority habitats. The data files can be accessed here: National Biodiversity Climate Change Vulnerability Assessment data.

The LWEC Climate Change Impacts Report Cards present the latest evidence on how climate change is affecting different aspects of our environment, economy and society.

### ***Coastal and Marine issues***

The following may be of help:

- Catchment flood management plans (considers all types of inland flooding, from rivers, groundwater, surface water and tidal flooding).
- Shoreline management plans (considers flooding from the sea).
- **Any estuary or harbour management plans** that are held locally.
- River basin management plans (covers entire river systems, including river, lake, groundwater, estuarine and coastal water bodies).
- Coastal Erosion Maps.
- The Marine Management Organisation has a marine planning evidence base which supplies a range of information on marine planning.
- There may be specific **Heritage Coast** information held locally, such as a management plan.

### ***Water Quality and Resources and Flood Risk Management***

The Planning Practice Guidance provides guidance on information sources for the water environment, such as:

- Water Industry National Environment Programme
- Water Cycle Studies
- Water and Sewerage Company Drainage Strategies and business plans
- Water Resource Management Plans
- Flood and Coastal Risk Management Plans and Strategies
- Abstraction Management
- Groundwater Vulnerability maps
- Location of Source Protection Zones

- Information from Environmental Statements
- Diffuse Water Pollution Plans
- Nutrient Management Plans

## Sustainability Appraisal

- 3.1 We welcome the opportunity to also comment upon the content of the Sustainability Appraisal (SA) and the proposed assessment process.
- 3.2 Broadly speaking we support the majority of the content within the SA Scoping Report. The Sustainability Objective within Figure 25 cover a wide range of topics which are relevant to an assessment of planning policies.
- 3.3 There are certain objectives which will be easier to quantify than others. For example, policies judged against Objective 8 (Homes) will presumably be attributed a more positive 'score' if they would deliver a larger number and mix of housing, incorporate a diversity of supply and include the provision of affordable housing.
- 3.4 Other impacts are far less easy to quantify. For example, the rationale for Objective 3 (Historic and Built Environment) is to conserve and enhance built and historic assets and promote high-quality design. A fair and true judgement against this objective is not as simple as saying that a potential development falls within a specified distance of a heritage asset as this would oversimplify the judgement of whether there would be a 'harm'. We have reviewed a number of SA's which do operate in a binary manner such as this and they fall into the trap of attaching importance to what can be measured instead of measuring what is important; as a consequence they are therefore less accurate and helpful to the plan-making process.
- 3.5 Instead, we urge the authority to apply a degree of judgement to the 'scoring' of proposals against the SA objectives. We acknowledge that the 'scoring' needs to accurately and fairly compare alternative options but there is no reason why this could not be achieved through a consistent application of judgement as opposed to binary measures such as distance. Indeed, this is how the planning system operates when matters such as harm to heritage assets is to be taken into consideration in the determination of a planning application.
- 3.6 Furthermore, it is only through the application of judgement that it is possible to assess the implications of 'proposals' as opposed to mere 'locations'. Taking biodiversity as an example, a

potential allocation boundary could be in close proximity to a protected habitat, however, given the scale of the proposals there is potential to eradicate harm through the incorporation of appropriate mitigation. Furthermore, the overall effects of the development could be positive as a consequence of net biodiversity gain. To judge a development proposal negatively in such circumstances would lead to not only an inaccurate, but a perverse outcome.

- 3.7 Applying a degree of judgement in the manner proposed would ensure that the SA is more than just a mechanical exercise but one which provides real value and benefit to the plan-making process.

***Suitability of potential development sites for walking and cycling***

- 3.8 Paragraphs 5.5-5.11 of the SA Scoping Report explain the process that will be adopted in determining the accessibility of a location by walking and cycling; essentially a proxy tool to establish whether a site is sustainably located. The principle of assessing accessibility in this way is supported, as is the broad approach. We do however have one comment / suggestion regarding the approach and a further recommended change to the assessment ‘scoring’ proposed beneath Figure 27.
- 3.9 There are a range of sites being promoted for development across East Devon. Some of these are small and will deliver just housing whereas others are larger, mixed-use developments will also incorporate a range of services and facilities. The Greenhayes proposal falls into the latter category and includes a relocated and expanded farm shop and café, primary school, community meeting space, accessible open space and children’s play provision alongside a significant number of new homes. To provide a fair and consistent assessment of all opportunities within East Devon, it is crucial that the proposed services and facilities are taken into consideration in the scoring and not just those that already exist.
- 3.10 It is presumably the case that the range of services listed under paragraph 5.8 are those frequently used by residents and therefore accessibility within walking and cycling distance would reduce the likelihood of future residents travelling by car. The notable absence from the list provided is ‘employment opportunities’. Given the number of vehicle trips associated with

commuting, it would be logical also to take into account the proximity to major employment locations. Indeed, if there are a wide range and number of employment opportunities available in close proximity to a site then there is a higher likelihood of future residents commuting on foot or by bicycle.

- 3.11 To reflect the sustainability advantages that exist as a result of the proximity of employment opportunities, we recommend that a further tier of scoring is included in Figure 27. We propose that a “+3” score is attributed to those locations *“within 800 m of basic services and a regular bus service or railway station and 1,600m of major employment opportunities”*. A distance of 1600m is considered a reasonable walking distance for the purposes of commuting.



MARCH 1<sup>ST</sup> 2021

## SVA COMMENTS ON EDDC Sustainability appraisal and strategic environmental assessment draft scoping report

All references below are to paragraphs unless otherwise stated

### General

The document should be updated to reflect the fact that we have left the EU. How much of the legislation/protection mentioned still applies? At least a comment on this is required. This is especially important in Appendix 1.

Everything in the document needs to be fully referenced to source material using a consistent referencing/footnote/endnote system - as is done in the section on social baseline data.

### Section 3

pages 13ff The various protected and notable sites - especially paras 3.17, 3.18 - needs a reference to a comprehensive list and where a map of them can be found ( sites are too small to be mapped within the report): if no such list/map exists it should be a priority to create one.

3.36 Design quality. It might help to raise design standards if there were a design guide. Is one envisaged? Or is this a matter for the revised neighbourhood plans, since guidance would need to vary across the district?

3.41 The CO2 emissions graph excludes agricultural land use - a major omission given the importance of livestock farming locally. This needs more than a passing mention, it needs some analysis, particularly differentiating between intensive and extensive livestock farming systems.

3.55 Since EDDC is the waste collection authority why is no data available for the volume of ED waste?

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)

3.73 The link to the housing needs report referred to in footnote 10 is broken. Without access to this report it is impossible for members of the public to make informed comment on the housing targets

contained in the issues and options paper. I did eventually track it down and it contains a lot of useful information.

3.74 We need to see household projections and projections of additional dwellings required, not just population projections, broken down by household size and affordability needs and showing in-migration separately. The following figures from the ORS report are illuminating:

- Assessed housing need over 20 years = 15,143 dwellings
- Government assessed housing need = 18,000 dwellings
- Difference is made up of:
  - 1180 dwellings to meet pent up demand
  - 1677 dwellings to meet additional net in-migration

3.79 All the affordability ratios are expressed 'upside down' making a nonsense of statements about trends. Figure 11 expresses this ratio correctly.

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.

3.90 Air pollution from traffic. Why only mention NO<sub>2</sub>? What about particulate matter?

3.124ff There need to be data on part time and casual working

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?

3.138 Why no mention of cycle routes - an important gap in local connectivity

Why no road traffic accident data?

#### **Section 4**

The purpose of this chapter is unclear- it seems to be ' why do we need a local plan?' Why is this argument necessary? Rather than expressing the right hand column as ' trends if there were no local plan' it could more powerfully and understandably be expressed as ' what benefits can a local plan bring?' This looks like a ' tick box' exercise which misses an opportunity to think carefully about what a local plan can and should do.

Climate change - more could be made of the contribution land use planning can make to a carbon-efficient development pattern (e.g. out of town shopping vs town centre)

#### **Section 5**

Figure 25: this table is an ill thought out mess, needing a lot more work. As such it will not be fit for purpose as a framework for assessing the local plan. It is important to get this table right, given the way it is intended to be used. The central column contains not ' factors' but a mixture of topics and objectives.

The proposals for assessing the plan are confusing. We hope this is work in progress!!

It looks from Figure 26 as if the intention is to assess the plan against the headline objectives, using a composite score. Given possible conflicts between the things termed 'factors', and probable differences between them in relative importance, it would be more meaningful to define sub-objectives and use these as the major level of analysis, so that any tradeoffs and weighting would be transparent. But we are unconvinced a mechanistic approach like this is helpful.

# SIDMOUTH TOWN COUNCIL

## Sidmouth Town Council (STC) Feedback to East Devon District Council (EDDC)

on

## Sustainability Appraisal and Strategic Environmental Assessment Draft Scoping Report – January 2021

as part of the development of the  
East Devon Local Plan 2021 - 2040

### Task 1A – Policy Context

Sidmouth Town Council recommends that the following documents are considered part of the context for the SA and SEA

- **Sidmouth Town Council Environment Policy,**
- **Sid Valley Neighbourhood Plan,**
- **STC Feedback to DCC Net Zero Task Force**

A Gap Analysis has been conducted between these documents and the EDDC Sustainability Appraisal and Strategic Environmental Assessment Draft Scoping Report – January 2021. The results are summarised in the Appendix below. It is also recommended that this analysis forms part of the Policy Context.

### Task A2 – Collecting Baseline Information

Sidmouth Town Council welcomes the collection of baseline information as part of the development of a new plan and would like to make the following recommendations with regard to the collection of baseline information

**Biodiversity** – The recently formed Sid Valley Biodiversity Group are undertaking baseline studies of a range of species and should be consulted on their findings. In particular the 2020 Hedgerow Survey conducted by Sidmouth Arboretum revealed that the hedgerows of the Sid Valley are in decline, and it is likely that the same is true across East Devon. Many hedgerows have failed and become relict because of lack of appropriate maintenance. Others are in a poor state because of excessive use of tractor mounted flails.

**Connectivity** – Broadband performance is generally thought of as being poor in the Sid Valley and whilst we welcome the focus this issue has been given; it would be helpful to collect some baseline information to determine the actual speeds being achieved as most people report less than is commonly advertised by suppliers.

### Task A3 - Identifying key sustainability issues

Sidmouth Town Council welcomes the consideration of the 14 areas listed as part of the development of the new local plan and would like to highlight the following observations, in addition to the policy considerations listed in the recommended documents under Task A1.

**Biodiversity** – Hedgerows make a significant contribution to the look of East Devon and they also have significant environmental importance but are absent from the specific issues identified. Hedgerows perform the following functions:

- They increase biodiversity as a home for many species of animals from invertebrate groups through to small mammals, and plants and fungi, and they are a food source for many species of animal.
- They increase tree cover.
- They increase carbon sequestration.
- They reduce the spread of traffic pollution, especially particulates.

- They slow surface water flow in times of heavy rain.
- They reduce soil erosion caused by wind.
- They contribute to public wellbeing through these effects, and by being a visually attractive landscape feature

Mature standard trees have a particular environmental and social value. The survey estimated the reduction in the number of standard trees and young trees that are the future standard. The combination of Ash Dieback and tractor mounted flailing will leave the valley's hedgerows with only 20% of the hedgerow tree population that would have been present 100 years ago.

**Climate change and carbon emissions** – Whilst welcoming the need for reduced carbon footprint from new buildings, the plan needs to also consider how the carbon footprint of existing buildings can be reduced. Sid Energy was set up some years ago to foster local power generation but the take up was not sufficient, despite there being significant feed in tariffs available; something that is no longer available.

In addition, it is noted that transport emissions have not reduced in East Devon as much as other emissions. Provision of alternatives to private car transport are vital. However lower usage is more important than rapid migration to electric cars as the carbon emissions from manufacture are roughly the same as from usage.

**Wellbeing** – Take away food outlets are a feature of all towns but the litter created by them can be significant. Much of this has the sellers name written on it and yet there appears to be no attempt to discourage unthoughtful disposal. Litter also appears on the beach and esplanade, and it often relies upon volunteers to remove it before it ends up in the sea. Much of this waste is plastic, adding to the mountain of such materials already polluting the world's oceans. Waste bins are provided and some residents and visitors do attempt to dispose of their waste thoughtfully but bins are not always emptied often enough. The emptying schedule appears to be governed by the clock whereas the weather has a far greater impact on the volumes of waste generated. Not surprisingly more people come to the beach when it is sunny rather than raining.

**Connectivity and transport** – 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 where many have to rely on significant lengths of copper wire to the fibre boxes some distance away.

## Task A4 - Defining sustainability objectives

**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 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 with deposit schemes, or similar, introduced to discourage unsociable disposal of waste. Location of bins in the vicinity of take away outlets should be reviewed, acknowledging many will eat whilst walking. Current litter blackspots should be targeted with new, or relocated, bins.

Seaside town litter reduction strategies need to tie bin emptying to the weather rather than a timetable.

**Town centres** – Working with Devon County Council, EDDC should seek to pedestrianise town centres to make them a more pleasant place to be, and to support local businesses.

## Appendix

Sidmouth Town Council Environment Policy		Sid Valley Neighbourhood Plan	STC submission to DCC Net Zero Taskforce	EDDC Local Plan 2021 - 2040
Natural Environment	Protect, and where possible enhance, the designated green spaces and corridors, conservation areas, and views, as laid out in the Neighbourhood Plan.	Policy 1	<p><b>Food, land and sea</b> – Support RHS Greening Great Britain encouraging horticulture and public space rewilding with DCC and EDDC</p> <p><b>Food, land and sea</b> – Protect open spaces and encourage use for wellbeing activities</p>	<p><b>Sustainability Objectives – Landscape:</b> To conserve and enhance the landscapes/ seascapes of our natural environment. <b>Issues:</b> 2/3 within AONB but scope for policy protection for other areas</p> <p><b>Sustainability Objectives - Health and activity:</b> To support healthy and active communities where people have access to attractive and functional recreation spaces. <b>Issue:</b> Allow people to be physically active</p> <p><b>Sustainability Objectives - Wellbeing</b> To support safe communities where people are not exposed to pollution. <b>Issue:</b> Minimal pollution and crime</p>
	Support and encourage the creation of a sustainable built environment through the planning process.	BN03	<p><b>The Built Environment</b> - Higher building standards to improve appearance of public spaces</p> <p>The Built Environment – Promote energy efficient housing and refuse permission if not</p>	<p><b>Sustainability Objective - Historic and built environment:</b> To conserve and enhance our built and historic assets and promote high quality architecture, design and accessibility in new build development. <b>Issues:</b> Heritage asset protection whilst offering town centre regeneration</p> <p><b>Sustainability Objective – Homes:</b> To provide and maintain a sufficient supply of good quality, financially accessible homes of mixed type and tenure. <b>Issue:</b> Affordable housing acknowledging different people have different needs</p> <p><b>Sustainability Objective – Climate change and carbon emissions</b> To minimise greenhouse gas emissions. <b>Issue:</b> High quality buildings with minimal emissions</p>
	Consider impact on biodiversity and sustainability of the management and use of the Sidmouth Town Council estate.	BN02	<p><b>Food, land and sea</b> – Create Biodiversity Plan</p> <p>The Built Environment – Encourage urban community allotments and use planting as barriers rather than fencing</p>	<p><b>Sustainability Objective – Biodiversity:</b> To conserve and enhance the habitat and wildlife of our natural environment. <b>Issues:</b> Ongoing threats and development can be directed to areas of lesser sensitivity.</p>

Low Carbon Town	Reduce greenhouse gas emissions from Sidmouth Town Council activities year on year until carbon neutrality is achieved, and promote the same in the community.	BN01	<p><b>Mobility</b> – Enhance Electric car charging stations</p> <p><b>The Built Environment</b> – Promote energy efficient housing</p> <p><b>Energy and Waste</b> – Use Green energy suppliers</p>	
	Support the appropriate generation and use of renewable and low carbon energy	<p>Policy 19 Policy 20</p> <p>Policy 19</p>	<p><b>The Built Environment</b> – Encourage clean growth projects and the circular economy</p> <p><b>Energy and Waste</b> – Encourage renewable energy projects</p> <p><b>Energy and Waste</b> – Encourage owners of larger buildings to generate their own electricity/heat</p>	<p><b>Sustainability Objective – Climate change and carbon emissions</b> To minimise greenhouse gas emissions. <b>Issue:</b> Support for renewable energy generation projects</p>
	Encourage use of public and shared transport, bicycles, and walking for both residents and visitors by provision, or promotion with others, of appropriate assets	<p>AC03 AC05</p> <p>AC02 Policy 15</p> <p>Policy 21</p>	<p><b>Mobility</b> - Create network of bike paths</p> <p><b>Mobility</b> – prioritisation of pedestrians and bicycles over cars and develop out of town parking</p> <p><b>Mobility</b> – Use electric powered buses with bike racks on them</p> <p><b>Mobility</b> – Promote walking routes, especially around schools</p> <p><b>Mobility</b> – Provide electric bike docking points and more cycle racks</p> <p><b>Mobility</b> – Enhance long distance walking paths as alternative to SW Coast Path</p>	<p><b>Sustainability Objective – Connectivity and transport</b> : 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. <b>Issue:</b> Broadband and non car infrastructure.</p>
Sustainability	Practice recovery, reuse, repair, remanufacturing and recycling in Sidmouth Town Council’s activities and promote the same in the community.		<p><b>Food, land and sea</b> -Work with local schools on projects on food waste reduction</p> <p><b>The Built Environment</b> – Repair rather than replace infrastructure (e.g. bus shelters)</p> <p><b>Energy and Waste</b> – Encourage zero waste and no single use plastics events</p> <p><b>Energy and Waste</b> – Support beach clean and litter picking events</p>	
	Preferentially engage local contractors who		<b>Mobility</b> – Produce Devon sustainable tourism strategy	

	demonstrate alignment to the Sidmouth Town Council's Environmental Policy		<p><b>The Built Environment</b> – Use locally sourced materials for new housing</p> <p><b>Energy and Waste</b> – Select Contractors based on environmental commitments</p>	
	Consider the impact of future climate change, such as sea level rise, intensity of storms, and drought, on all decisions		<p><b>Food, land and sea</b> – Support reduced water use initiatives with SWW</p>	<p><b>Sustainability Objective – Climate change adaption:</b> To adapt to the possible effects of climate change. <b>Issue:</b> Address flooding and erosion</p> <p><b>Sustainability Objective – Water resources :</b>To utilise our water resources efficiently and minimise their loss or degradation. <b>Issue:</b> Maintain water quality</p>
Engagement	Inform and engage Sidmouth's residents and businesses, schools and event organisers of the Council's environmental activities, and respond and react to feedback.	BN03 - Trees BN04 – SiB  CC04	<p><b>Food, Land and Sea</b> – encourage local environmental groups to thrive and expand activity</p> <p><b>Energy and Waste</b> - Create library of documents to help individuals reduce their environmental impact</p>	<p><b>Stage D:</b> Consulting on proposed local plan and the SA report.</p>
	Support individual, business, charity, and event organiser behaviour change and adoption of low environmental impact practices.	BN02  Policy 17	<p><b>Food, land and sea</b> – Encourage horticulture/allotments and collective growing</p> <p><b>Mobility</b> – encourage working from home and enhance broadband</p> <p>The Built Environment – Promote cross generational volunteering</p>	
	Set biannual targets and report on progress, undertaking periodic audits of the Sidmouth Town Council's environmental management system		<p><b>The Built Environment</b> – Upgrade Town Council buildings to ensure they have zero carbon emissions and publish progress to that goal</p> <p><b>Energy and Waste</b> – Promote measuring carbon footprint</p>	
		ET04	<p><b>Food, land and sea</b> – Beach Management Plan and Flood Planning</p>	
			<p><b>Food, land and sea</b> - Encourage local plant based alternatives to meat and dairy</p>	
			<p><b>Food, land and sea</b> – Stop plastic getting into sea by redesigning drains</p>	

				<p><b>Sustainability Objective - Land resources</b> To utilise our land resources efficiently and minimise their loss or degradation. <b>Issue:</b> Sensitive exploitation of natural resources</p>
				<p><b>Sustainability Objective - Water resources</b> To utilise our water resources efficiently and minimise their loss or degradation. <b>Issue:</b> Protection of water quality</p>
				<p><b>Sustainability Objective - Access to services</b> To provide accessible and attractive services and community facilities for all ages and interests. <b>Issue:</b> Provision for rural areas</p>
				<p><b>Sustainability Objective - Jobs and employment</b> To foster a strong and entrepreneurial economy and increased access to high quality skills training to support improved job opportunities and greater productivity. <b>Issue:</b> Historically low unemployment but low wage – attracting skilled jobs</p>
				<p><b>Town centres</b> To safeguard and strengthen the vitality and viability of town centres. <b>Issue:</b> Challenge of online retail to existing shops</p>

Sidmouth Town Council Environment Policy uses 4 heading:

- Natural Environment
- Low Carbon Town
- Sustainability
- Engagement

DCC Zero Carbon Document uses 4 heading:

- Food Sea and Land
- The Built Environment
- Energy and Waste
- Mobility

EDDC Plan used 14 heading in defining sustainability Objectives

1. Biodiversity
2. Landscape
3. Historic and built environment
4. Climate change and carbon emissions
5. Climate change adaption
6. Land resources
7. Water resources
8. Homes
9. Health and activity
10. Wellbeing
11. Access to services
12. Jobs and employment
13. Town Centres
14. Connectivity and transport

# T DUMPER

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**From:** Tim Dumper  
**Sent:** 15 March 2021 10:55  
**To:** Planning Policy  
**Cc:**  
**Subject:** Sustainability Appraisal

Thankyou for this carefully worked document, and the ability to contribute. I do so in an individual capacity, but as a member of Exmouth Town Council's Planning Committee, and an active environmental person, involved with Transition Exmouth.

If I had 6 months, and was an expert in everything, I would no doubt comment thoroughly, but I haven't and I am not, so will restrict myself to a few specifics, along with more general comment.

## General comment

Please give due weight to qualitative information - in many areas quantitative data is either unavailable or difficult or impossible to measure. The mantra "If you can't measure it, you can't manage it" should be ignored where possible!

You have resources available to you in the putting together of this plan - your own in house Countryside Team, the AONBs, Wildlife Trusts and other voluntary but well-informed bodies for instance. I hope EDDC may have an ecologist in house soon to draw on their expertise.

The issue of EU Policy and protections is well-made, but in the wake of Brexit we have to do our best to replicate those protections. I am very sceptical about your statement at 3.24 that Government policy seeks to protect against biodiversity loss, both from some of the decisions we have seen, and in comments made by the PM and other senior ministers. I would ask the Council to be similarly sceptical in building sustainability into the new plan in the wake of Brexit. I was pleased to read your 3.21, recognising that biodiversity loss had been happening over decades, so this needs some building back, as well as protection from future threats.

Neighbourhood Plans are in place in many towns and parishes, including here in Exmouth, many of which have actions and policies connected with sustainability. These should be consulted.

The recovery from Covid is very important, and we can learn lessons from the positives and negatives in building the more sustainable East Devon we all want.

## Other key areas mentioned in your draft:

Waste - yes, reducing material use, and re-use are even more important than recycling, and the recent figures for waste per household - ED the lowest in England are hugely encouraging. This needs somehow factoring in. The message that incineration is also damaging as well as landfill, and we need to find other ways to heat houses etc other than burning waste.

Public Transport - Actually, we need better services, buses and trains, and made cheaper and more accessible. At present people tend to jump in the car at any opportunity. If there is a chance to lobby it should be to re-regulate buses. 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. By lumping all under "Affordable" whatever the definition used, you diminish the perceived need. At present private renting is expensive, and often of poor quality. This leads to divided communities - not sustainable.

Employment Policy - We should be doing everything possible to minimise commuting to Exeter and other places to create self sufficient local places. Use of electronic communication, improvement of broadband etc should also help facilitate this.

Tim Dumper

# TRANSITION EXMOUTH

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**From:** Transition Exmouth <transitionexmouth@gmail.com>  
**Sent:** 15 March 2021 11:46  
**To:** Planning Policy  
**Subject:** Sustainability Appraisal Scoping Report - comments

Dear Planners,

Transition Exmouth is a community group dedicated to taking steps towards a carbon zero lifestyle.

We welcome the broad goals of the Report.

We feel that this report should acknowledge the Shifting Baseline Syndrome

<https://ore.exeter.ac.uk/repository/bitstream/handle/10871/29827/manuscript.pdf;jsessionid=3AC46122E2627F0F3B08C2F9266E2D4D?sequence=1>, by which researchers take the current state of the environment to be the natural norm.

It is true that our biodiversity is precious, but maintaining it at current levels is inadequate, given that we have lost so much of our historic tree cover, and pollinator insects and other wildlife have faced a similar decline here as across the country.

Climate change adaption p19 - there is need for local authorities to be in the forefront of educating residents about steps they can take to reduce their carbon footprint, improve recycling rates etc.

Transport: this should also include a baseline of cycle paths currently in place, and acknowledge the necessity of a rise in both their number and use, given that the main air pollutant in East Devon is noted as coming from traffic. Charging point availability and spaces for co-owned ebikes and cars should similarly be part of the baseline.

p56 Suitability of potential development sites for walking and cycling - more weight to be given to the necessity of segregated cycle lanes being a requirement for all new development, and a priority in retrofitting to all existing roads.

We hope EDDC may have an ecologist in house soon to draw on their expertise, and we look forward to the appointment of the proposed Climate Action officers

The issue of EU Policy and protections is well-made, but in the wake of Brexit we have to do our best to replicate those protections. We are very sceptical about your statement at 3.24 that Government policy seeks to protect against biodiversity loss, both from some of the decisions we have seen, and in comments made by the PM and other senior ministers. We would ask the Council to be mindful of the need to exceed government objectives in building sustainability into the new plan in the wake of Brexit. We are pleased to read your 3.21, recognising that biodiversity loss had been happening over decades, so this needs some building back, as well as protection from future threats. Acknowledging the tendency towards Shifting Baseline Syndrome may help others appreciate this need.

Neighbourhood Plans are in place in many towns and parishes, including here in Exmouth, many of which have actions and policies connected with sustainability. These should be consulted.

The recovery from Covid is very important, and we can learn lessons from the positives and negatives in building the more sustainable East Devon we all want. The home page of every local authority website should have clear links to dealing with the Climate Emergency, as at present the covid emergency is covered. We recommend OurPlaceOurplanet.org in this respect.

Other key areas mentioned in your draft:

Waste - yes, reducing material use, and re-use are even more important than recycling, and the recent figures for waste per household - ED the lowest in England are encouraging, but still fall far below what is needed. This needs somehow factoring in. The message that incineration is also a damaging process needs to be factored in.

Public Transport - Actually, we need better services, buses and trains, and made cheaper and more accessible. . Active travel needs to be encouraged everywhere, to a level far beyond 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. By lumping all under "Affordable" whatever the definition used, you diminish the perceived need. At present private renting is expensive, and often of poor quality. This leads to divided communities - not sustainable.

Employment Policy - We should be doing everything possible to minimise commuting to Exeter and other places to create self sufficient local places. Use of electronic communication, improvement of broadband etc should also help facilitate this.

best regards

Carol Jay (TrEx Secretary)

Connect with us on:

[Our Place Our Planet : website with local and national links to help us take steps for Climate Action Transition Exmouth website](http://www.greendrinks.org/Devon/Exmouth)  
<http://www.greendrinks.org/Devon/Exmouth>

 [@TransitionEX8](https://twitter.com/TransitionEX8)

 <https://www.facebook.com/transition.exmouth/>



Transition Exmouth's mission: To strengthen the community's response to Climate Change, inequality and shrinking supplies of resources, including energy, water and land.

To build long-term town resilience, preserve biodiversity and reduce carbon emissions.