



**South Hams
District Council**

**SUSTAINABILITY APPRAISAL/
STRATEGIC ENVIRONMENTAL ASSESSMENT
of SOUTH HAMS DISTRICT COUNCIL**

IVYBRIDGE SITE ALLOCATIONS

**DEVELOPMENT PLAN DOCUMENT:
(Pre Submission Publication)**

SUSTAINABILITY APPRAISAL REPORT

April 2010

prepared by

enfusion



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SUSTAINABILITY APPRAISAL REPORT

for & on behalf of Enfusion Ltd

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SOUTH HAMS DISTRICT COUNCIL

IVYBRIDGE DEVELOPMENT PLAN DOCUMENT (DPD): SITE ALLOCATIONS

SUSTAINABILITY APPRAISAL (SA) REPORT

CONTENTS

- 1 Summary and Outcomes**
 - Non Technical Summary
 - Statement on the Difference the SA Process has made
 - How to Comment on this SA Report

- 2 Background**
 - Purpose of the SA and the SA Report
 - DPD Contents and Objectives
 - Compliance with the SEA Directive and Regulations

- 3 Appraisal Methodology**
 - Scoping the Key Sustainability Issues
 - Updating the SA Scoping (2009)
 - Appraising the Vision and Objectives
 - Appraising the Development Proposals
 - Relationship between SA and the Sites Assessment Method
 - Sustainability Threshold Assessment (STA)
 - Summary of SA Method
 - Consultation

- 4 Sustainability Context**
 - Introduction and Sustainability Baseline Characteristics
 - Local Plans and Programmes Relevant to the DPD
 - The SA Framework
 - Habitats Regulations Assessment

- 5 SA of Ivybridge DPD**
 - SA of Vision and Objectives
 - SA of Development Proposals
 - Summary of SA Findings
 - Progression of SA Recommendations

- 6 Implementation & Monitoring**

Table 1: The Sustainability Appraisal Framework

Table 2: Sustainability Appraisal of the Ivybridge Site Allocations DPD –
SA findings

APPENDICES

- I Review of Relevant Plans and Programmes (work undertaken in 2005) & update (2009) (available separately)
- II Collation & Analysis of Baseline Information (work undertaken in 2005) & update (2009) (available separately)
- III Update to the Scope of the SA/SEA (January 2009) (available separately)
- IV SA of Vision and Objectives (attached)
- V SA of Development Proposals (attached)

1.0 SUMMARY AND OUTCOMES

Non Technical Summary

This Sustainability Appraisal (SA) Report

- 1.1 This Report documents the processes of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) for the South Hams District Council Ivybridge Site Allocations Development Plan Document (DPD) (Pre Submission Publication) as required by planning legislation and Government guidance. SA assists in promoting more sustainable development through an ongoing dialogue and assessment during the preparation of development planning documents. SEA considers the potential impacts of planning proposals on the environment and is a requirement of European legislation. In England, SEA is incorporated into the SA process and consideration of socio-economic issues is dealt with to the same level of detail as environmental. The Council commissioned consultants Enfusion to progress the SA work in January 2005.

Sustainability Issues, Problems and Opportunities

- 1.2 During early 2005 a sustainability scoping process was carried out to help ensure that the SA covered the key sustainability issues that are relevant to the development planning system in South Hams. Relevant plans and programmes were reviewed to develop a wider understanding of the issues and priorities for South Hams, together with a description of the current and predicted social, environmental and economic characteristics of the District. From these studies and public consultation, the key sustainability problems and issues were identified as affordable housing, local employment, the Sherford New Community, high design standards for development, protection of environmental quality, second homes, car usage, and accessibility. The sustainability scoping was updated in January 2009 in consideration of changes to other plans and information since 2005 and to make it more relevant to appraising development site allocations.

Method for Appraising the Sustainability of DPDs & Consultation

- 1.3 A Sustainability Appraisal Framework was compiled during 2005 and included objectives that aim to resolve the issues and problems identified. It was proposed to use these Sustainability objectives to test the draft development plan documents as they were being prepared. This approach and the proposals for testing the development planning process was written up into a SA Scoping Report that was sent to a wide range of organisations and also made available on the Council's website. Comments were invited and received from a number of these organisations; this consultation helped improve the Appraisal Framework. This framework has been used to appraise a number of DPDs, including the Core Strategy.

- 1.4 The SA objectives and their decision-aiding questions were reorganised and amended to make them more relevant to a comparative assessment of the sustainability of potential development sites and to inform the preparation of the Site Allocation DPDs. This proposed approach (Sustainability Threshold Assessment STA) to site assessment was subject to consultation in January 2009 and the method then further refined with a Panel of South Hams representatives, including statutory consultees during an options consultation in May 2009, the STA was then revised after considering comments made by the panel for Pre-submission Publication Stage. In this way, the sites assessment process was integrated with the sustainability appraisal process. The development proposals identified in the Ivybridge DPD were then subject to SA using the original SA Framework of objectives established for the Core Strategy to produce a commentary and SA recommendations where appropriate.

Appraising the Ivybridge Site Allocations DPD (Pre Submission Publication)

- 1.5 The Ivybridge DPD is one of five Site Allocations DPDs being prepared simultaneously and together these will be key Local Development Framework (LDF) documents for the South Hams. The South Hams LDF Core Strategy, an Area Action Plan for the Sherford New Community and an Affordable Housing DPD have already been adopted by the Council. The Ivybridge DPD deals with the allocation of sites in the town of Ivybridge. The DPD addresses the period up to 2016 and beyond, reflecting both the strategic direction set by the Core Strategy, and the emergent planning scenario set out by the Regional Spatial Strategy to 2026.
- 1.6 The Vision and Objectives and development proposals of the Site Allocations DPD were each appraised in 2009 using professional judgement and the baseline information against the SA Framework of Objectives. Progression towards or away from sustainable development was recorded; potential predicted effects were reported where applicable, highlighting short/long term effects, and cumulative effects if possible. Where appropriate, suggestions were made for improving the sustainability of the content of the DPD and these have been incorporated in the Pre-Submission Publication document.

SA Findings

- 1.7 Generally the DPD proposals were found to positively contribute towards the SA Objectives for Sustainable Development in the South Hams. A small number of recommendations were made as a result of the SA which could improve the sustainability of the DPD.

Next Steps

- 1.8 This SA/SEA Report is now presented for public consultation, together with the Ivybridge Site Allocations DPD (Pre Submission Publication).

Comments received will be reviewed and a Final SA Report that records the whole SA/SEA process will be published with the adopted DPD.

Statement on the Difference the SA/SEA process has made

- 1.9 The DPD for Ivybridge builds upon the adopted Core Strategy for South Hams. The Core Strategy has been subject to detailed SA/SEA and therefore significant findings would not be expected from this SA. The detailed SA illustrates that the DPD will contribute to sustainable development in the District.
- 1.10 However, the key difference the SA has made to the process has been through the integration of the SA/SEA consideration of options/alternatives with the Council's site selection process, through the use of the SA/SEA Sustainability Threshold Assessment method. This has ensured a robust and sustainable selection process that will help to deliver sustainable outcomes in the provision of approximately 100 dwellings and 5 hectares of new employment land in the Ivybridge area to 2016 and a further 325 dwellings plus 5 ha employment land beyond 2016.
- 1.11 Some changes have already been made to the Site Allocations in response to interim SA work carried out as part of the ongoing and iterative process.

HOW TO COMMENT ON THIS SA REPORT

- 1.12 If you have any comments on the SA/SEA of the Ivybridge Site Allocations DPD (Pre Submission Publication) we would be grateful to receive them. Your views are important and the Council needs to receive them by **4pm on 11 June 2010**. Comments may be made online or sent to the Forward Planning Team by post, fax or email.

Online: <http://consult.southhams.gov.uk/portal>

Post: Forward Planning Team, South Hams District Council, Follaton House, Plymouth Road, Totnes TQ9 5NE

Fax: Forward Planning 01803 861404.

Email: forward.planning@southhams.gov.uk

2.0 BACKGROUND

Purpose of the Sustainability Appraisal (SA) and the SA Report

- 2.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Documents (LDDs). This requirement is set out in Section 39 (2) of the Planning and Compulsory Purchase Act, 2004 and Planning Policy Statement 12: Local Spatial Planning, 2008. Local Development Documents must also be subject to Strategic Environmental Assessment¹² (SEA) and Government advises³ that an integrated approach is adopted so that the SA process incorporates the SEA requirements.
- 2.2 This is the SA Report that documents the Sustainability Appraisal/Strategic Environmental Assessment processes for the Ivybridge Site Allocations DPD (Pre Submission Publication). The Sustainability Appraisal Framework discussed in Section 3 of this SA Report indicates the relationship between the SA and the SEA; compliance with the SEA Regulations is signposted below in this section. This SA Report is being published for consultation with the Ivybridge Site Allocations DPD (Pre Submission Publication) document in accordance with SEA Regulations and SA Guidance.

Ivybridge Site Allocations DPD (Pre Submission Publication): DPD Vision, Objectives and Development Proposals

- 2.3 The Core Strategy is the overarching strategic document of the South Hams Local Development Framework (LDF), and sets out the key elements of the planning framework for the District (apart from the area that lies within the Dartmoor National Park, which will be covered by the Dartmoor LDF). The Core Strategy was developed through 2004 – 2006 with the Submission document published in January 2006; an Examination was held in July 2006 and the Council adopted the Core Strategy in December 2006.
- 2.4 The Ivybridge Site Allocations DPD (Pre Submission Publication) must accord with the planning vision and strategy set for the district by the Core Strategy. In the Core Strategy, Ivybridge is designated in Policy CS1: Location of Development as an Area Centre. Area Centres are defined in the Core Strategy as *'settlements that function as focal points for the sustainable provision of local housing and employment opportunities, education facilities and other local services'*. In addition, Policy CS2 of the Core Strategy allocates approximately 100 dwellings to the Ivybridge area in the period up to 2016, and Policy CS3 allocates 5ha of employment land for the area. It is the role of the Ivybridge

¹ EU Directive 2001/42/EC

² Environmental Assessment of Plans and Programmes Regulations 2004

³ ODPM, 2005 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*

DPD to specify the most appropriate location for the dwelling and employment land allocations.

- 2.5 The Ivybridge DPD contains a Vision, Objectives and Development Proposals as follows:

The Vision for Ivybridge

A vital, vibrant, sustainable community, with enhanced status as a destination, where:

- The town centre is regenerated, taking advantage of its riverside setting and industrial heritage;
- Public space provides a focus and heart to town life;
- Its role as a sports and leisure hub is enhanced;
- The town serves an expanding hinterland through sustainable transport links, particularly enhancing the role of the railway station;
- The needs of all can be met locally, particularly for affordable homes and new jobs;
- Its environment and role as the 'Gateway to the Moor' are protected and enhanced

Objectives for Ivybridge

- IO1:** Improve the self-sufficiency of Ivybridge and give it an identifiable "heart";
- IO2:** Provide for business growth and development that supports the regeneration of Ivybridge;
- IO3:** Provide affordable housing to meet the needs of the Ivybridge area;
- IO4:** Ensure that new development is located to minimise the need to travel and optimise the choices between travel modes;
- IO5:** Improve focus and enhance access to the River Erme;

Development Proposals:

Proposal I1: East of Ivybridge

Proposal I2: Ivybridge Central Area

Compliance with the SEA Directive & Regulations

- 2.6 The SEA Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (ie: SEA is subsumed within the SA process, as for the SAs of the South Hams LDF, including the Ivybridge DPD), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. Consequently the requirements for reporting

the SEA process are set out below, and the section of the report that progresses each requirement indicated.

- 2.7 *An outline of the contents, main objectives of the plan and relationship with other relevant plans:*
- Section 2 of this report sets out the contents and main objectives of the Ivybridge DPD. The relationship with other relevant plans is summarised in Section 4 and Appendices I and III of this report.
- 2.8 *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan:*
- Section 4 of this report summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the South Hams. Appendix II sets out this information in more detail. The likely evolution of current conditions ('trends') is detailed in Appendix II and updated in Appendix III, where available.
- 2.9 *The environmental characteristics of areas likely to be significantly affected:*
- Where relevant and available, information regarding particular areas has been included in Appendix II and updated in Appendix III.
- 2.10 *Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance:*
- Section 4 of this report summarises existing sustainability problems (including environmental problems) for the South Hams area.
- 2.11 *The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation:*
- Appendix I of this report provides the summary of objectives for sustainability in the South Hams (including environmental objectives), and the implications of these objectives for the LDF.
- 2.12 *The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects:*

- The SA Framework of objectives presented in Section 4 of this report shows which of the issues listed by the SEA Regulations are progressed by which SA Objectives. This assures that all of the issues are considered during the assessment of each part of the Ivybridge DPD, since each policy is assessed against each SA Objective.
 - The likely sustainability effects of implementing the Ivybridge DPD (including environmental effects) is summarised in Section 5 of this report, and detailed in Appendices V-VI, and in the evidence base document *Sustainability Threshold Assessment of Development Site Options*. Where possible, an indication of whether effects are likely to be cumulative, short, medium and long-term etc has been included.
- 2.13 *The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan:*
- Where significant adverse effects, including environmental effects, have been predicted, the SA has sought where possible to identify means of offsetting these effects. These are provided in the form of recommendations in the appraisal matrices at Appendix IV-V and summarised in Section 5 of this report.
- 2.14 *An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information:*
- Alternatives were considered through the DPD site selection process, using the Sustainability Threshold Assessment method. A range of site options were assessed against the STA framework and this assessment can be found in the document accompanying both the SA and the Site Allocations DPD: *Sustainability Threshold Assessment of Development Site Options*.
 - Details of how the assessment was undertaken are provided in Section 3 of this report (appraisal methodology), and difficulties encountered in compiling information are summarised in Section 4 of this Report.
- 2.15 *A description of the measures envisaged concerning monitoring:*
- Measures envisaged concerning the monitoring of the sustainability effects (including environmental effects) of implementing the Ivybridge DPD are provided in Section 7 of this report.

2.16 *A non-technical summary of the information provided under the above headings:*

- The non-technical summary is set out at the beginning of this report in Section 1.

3.0 APPRAISAL METHODOLOGY

Scoping the Key Sustainability Issues

- 3.1 Enfusion Ltd was commissioned in January 2005 by South Hams Council to progress the SA work. A scoping process was undertaken during early 2005 to help ensure that the SA covers the key sustainability issues that are relevant to the spatial and development planning system in the South Hams district. This included the development of an SA Framework of objectives (presented at the end of section 4 of this report) to comprise the basis for appraisal. A Scoping Report was prepared to summarise the findings of the Scoping process. This was published in April 2005 for consultation with stakeholders and is also available on the Council's website. Responses to this consultation, and how they were taken into account, are reported in the SA Report accompanying the adopted Core Strategy (2006).

Updating the SA Scoping (2009)

- 3.2 The original SA Scoping Report in 2005 set out key sustainability issues and characteristics for South Hams and it was confirmed in early 2009 that these remain largely unchanged. An update of the baseline information was prepared for the district with specific reference to the four towns and this helped to identify the special characteristics of each settlement. This updating of the SA scope was published for consultation with key stakeholders in January 2009 and no responses were received.

Appraising the Ivybridge DPD Vision and Objectives

- 3.3 The Vision and Objectives were appraised against the SA Framework and compatibility with the SA objectives was assessed. Detailed matrices presenting the findings of the SA are set out in Appendix IV. The compatibility analysis used professional judgement with the updated baseline information and categories of potential likely significant effects/compatibility as follows:

Key to Compatibility Analysis	
++	Strongly compatible
+	Compatible
-	Incompatible
--	Strongly incompatible
?	Uncertain
0	Not relevant to SA Objective

Appraising the Ivybridge DPD Development Proposals

- 3.4 The Development Proposals were appraised using the SA framework established in 2005. The appraisals were carried out using professional judgement and considering progression towards or away from the SA objectives for sustainability judged against the baseline, including the updated data more specific to the settlements. Matrices set out the summary findings of the STA site option assessment process. Against these STA findings an SA/SEA commentary is provided for those SA objectives that are relevant at the site allocation level. Any likely significant cumulative effects of the development proposals on Ivybridge were also considered and reported.
- 3.5 The SA Framework of objectives and decision-aiding questions is set out in Table 4.1 and the key to the likely significance effects set out in Table 4.2 in the following Section 4 of this SA Report.

Relationship between SA and the STA of Development Site Options

- 3.6 The SA objectives and their decision-aiding questions were reorganised and amended to make them more relevant to a comparative assessment of the sustainability of potential sites. This proposed approach (Sustainability Threshold Assessment STA) to sites assessment was subject to consultation in January 2009 and the method then further refined by establishing a Panel of South Hams representatives, during an options consultation in May 2009, the STA was then revised after considering comments made by the panel for the Pre-Submission Publication stage. The Panel involved the District and County Councils, Environment Agency, Natural England, Development industry, business and community representatives. In this way, the sites assessment process was integrated with the sustainability appraisal process.
- 3.7 The Sustainability Threshold Assessment of Development Site Options (available separately and provided as evidence to the DPD and the SA) sets out the details. The method acknowledges that a number of sustainability factors are common to all sites, for example, it is assumed that any site will be developed to a high quality design, be adequately served by infrastructure, and maximise energy efficiency. Therefore, these factors did not form part of the site assessment comparative assessment. Five categories of significance for the differentiating factors, such as flood risk and accessibility, were identified with thresholds and a colour system used to aid presentation of findings.
- 3.8 Once the STA exercise had been completed, a Quality Assurance exercise was undertaken to ensure that each of the criteria had been applied consistently across the district. This exercise led to some additional clarification around the methodology and subsequent changes to the scoring of some criteria, and the overall scoring of some sites. The main areas of change relate to the accessibility criteria which are now more explicit in their consideration of the range of facilities considered, particularly employment uses. This has led to

lower scores in some of the village. The Quality Assurance exercise also removed the summary text around attributes and constraints, as this was difficult to apply consistently, and did not add enough added value to the process to warrant revising in great detail.

- 3.9 The draft development proposals identified through the STA process were then subject to SA using the original SA Framework of objectives established for the Core Strategy. Since the STA method had developed from the SA process, a pragmatic approach was taken to this subsequent SA. Professional judgement was used to appraise the development proposals and commentary made with recommendations for proposed mitigation of any significant adverse effects identified; particular consideration was also given to cumulative effects.

Summary of SA Method

- 3.10 The method used for this Sustainability Appraisal of the Ivybridge Site Allocations DPD (Pre Submission Publication) comprises the following elements:
- Identifying relevant baseline information and other plans or programmes that influence this DPD
 - Compatibility analyses of the Vision and Objectives against the SA Framework of objectives
 - Taking into account the findings of the STA process, the sites were appraised against the objectives of the SA Framework, drawing out and detailing the areas where each development proposal has specific potential impacts; highlighting adverse/beneficial, short/long term effects, cumulative effects, with recommendations for proposed mitigation or enhancement where identified.
- 3.11 The SA has been carried out using professional judgment with the Sustainability Appraisal Framework and drawing upon selected information in the Review of Plans and Programmes, and the Baseline Information (SHDC, 2005 and updated in early 2009) (also available separately as Appendices I and II).

Consultation

- 3.12 The key sustainability issues were identified through the SA scoping process that was subject for formal consultation by the Council with the public and other stakeholders during early 2005. The SA of the Core Strategy Objectives and Strategic Policies was carried out during May - June 2005 and the Preferred Options were subject to formal consultation. The Core Strategy was further refined as a result of this consultation and the Submission Document with the final SA report were published for consultation and examination in January 2006. Details of the SA consultation are presented in the final SA Report for the Core Strategy.

- 3.13 This SA Report is being published for public consultation along with the Ivybridge Site Allocations DPD (Pre Submission Publication), in accordance with SEA Regulations and SA Guidance. It will be published on the Council's website www.southhams.gov.uk and sent to statutory consultees and the wider stakeholder group that was consulted on the SA Scoping process.

4.0 SUSTAINABILITY CONTEXT

Introduction and Sustainability Baseline Characteristics

- 4.1 The details of the SA scoping process for South Hams are presented in the SA Scoping Report (SHDC, 2005). The key issues, problems, objectives and opportunities for sustainable development, spatial and development management planning were identified from:
- A review of plans and programmes
 - Analysis of baseline information
 - Consultation
- 4.2 The key strategic characteristics for sustainable development in South Hams were detailed in the SA of the Core Strategy and are summarised as follows:
- Affordable housing
 - Local employment and prosperous economy
 - Sherford new community
 - High design standards for development
 - Protecting environmental quality
 - Second homes
 - Car usage
 - Accessibility
- 4.3 The baseline information is not reproduced here but can be found on the South Hams District Council website, along with the full list of plans and programmes, at http://www.southhams.gov.uk/index/residents_index/ksp_development_and_planning/ksp-development_and_planning-forward/sp-forward_planning-sustainability_appraisal.htm. The Baseline and Plans and Programmes review can also be found as separate appendices I and II to this report.
- 4.4 This SA of the Ivybridge DPD has also been informed by recent and ongoing strategies and studies that provide more detailed information and contextual analysis for the Ivybridge area. Relevant strategies, studies and plans are outlined below in Section 4.5. The key issues arising that are priorities for this area are summarised as follows:
- The full range of services and facilities necessary to support its size, role and function as an Area Centre has not kept pace with the rapid growth over recent decades.
 - Ivybridge is viewed as a dormitory settlement, lacking an identity, with people principally going to Plymouth to meet their needs, especially to work.
 - The town centre is weak and lacks an identifiable 'heart'. There is a limited choice of retail outlets and strong competition from Plymouth and out of town shopping stores.

- The River Erme is a key characteristic of Ivybridge, but is often overlooked.
- There is a deficiency of open space, sport and recreation and youth facilities;
- There is a need to improve parking and traffic management, particularly in the town centre.
- The section of the A38 close to Ivybridge is operating at capacity.

Local Plans and Programmes Relevant to the Ivybridge DPD

- 4.5 Devon Local Transport Plan (2006-2011)
 South Hams LDF Adopted Core Strategy, December (2006)
 South Hams Housing and Market Needs Assessment (2006)
 South Hams Strategic Partnership's Sustainable Community Strategy 2007-2011
 Employment Land Review (commissioned by South Hams, North Devon & Torridge District Councils, West Devon Borough Council, 2006)
 South Hams Public Space Strategy (2008-2012)
 South Hams Strategic Flood Risk Assessment (2006)
 Market & Coastal Town Association Review - Ivybridge
 Community Action Plan - Ivybridge Area Partnership (MCTi) (May 2004)
 Ivybridge Masterplan, (ADG) (Jan 2004)
 Ivybridge Town Council: A Future Vision for Ivybridge (Nov 2000)

The SA Framework

- 4.6 The SA Framework presented in the following table comprises a set of Objectives for sustainability that was defined from the SA Scoping process. Each SA Objective has a number of decision-aiding questions (or sub-objectives) that are designed to help the appraisal by clarifying the details of the sustainability issues as well as helping to improve the objectivity of the appraisal. They help to ensure that the SA is relevant to spatial planning and the characteristics of the South Hams area.

Table 1: Sustainability Appraisal Framework

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
1	Balanced Communities <i>SEA topic: Population</i>	
	Promote community viability and balance	<ul style="list-style-type: none"> ▪ Promote mixed use, mixed housing type and mixed tenure developments ▪ Encourage regeneration and enhancement of viable communities ▪ Enable independent lifestyles for the elderly and those with disabilities ▪ Provide sites for community services and facilities (education, health, recreation, social care etc) ▪ Provide sites for business and employment within communities ▪ Enable people to live near to where they work.

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
		Promote social inclusion and community ownership
2	Access	
	<i>SEA topic: Population and Human Health</i>	
	Enhance access to jobs, education, services, cultural and leisure facilities for all	<ul style="list-style-type: none"> ▪ Enhance access, particularly in rural areas ▪ Promote accessible jobs, services and facilities such as shops, schools, banks, health centres, community centres, libraries, sports and leisure facilities, especially in under-served localities and Sherford New Community ▪ Improve quality and capacity of public transport, particularly in new developments ▪ Encourage integrated public transport ▪ Provide for basic services within walking distance of residents <p>Reduce isolation of minorities and people with limited mobility</p>
3	Housing	
	<i>SEA topic: Population and Human Health</i>	
	Ensure that all have access to a range of good quality housing to meet their needs, particularly affordable housing for identified local needs	<ul style="list-style-type: none"> ▪ Restrict second home ownership ▪ Provide dwellings to allow local residents, including young people, to remain within their communities
4	Quality of the Built Environment	
	<i>SEA topic: Population and Human Health</i>	
	Enhance the form and design of the built environment	<ul style="list-style-type: none"> ▪ Ensure new development is located in line with sustainable principles ▪ Promote high density in new development wherever appropriate ▪ Insist upon high design quality and respect for local character, distinctiveness and surrounding environment in new development <p>Protect and enhance the quality of green and open spaces</p>
5	Health	
	<i>SEA topic: Population and Human Health</i>	
	Provide a healthy and safe environment	<ul style="list-style-type: none"> ▪ Provision of space for informal recreation ▪ Design out crime and fear of crime in local communities ▪ Contribute to a safe, secure built environment ▪ Encourage safe provision for walking and cycling <p>Prevent unacceptable levels of noise, light, odour and air pollution, through application of the precautionary principle</p>
6	Employment	
	<i>SEA topic: Population and Material Assets</i>	
	Promote a range of quality employment	<ul style="list-style-type: none"> ▪ Promote reuse of redundant agricultural buildings for employment ▪ Encourage provision of jobs accessible to residents

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
	opportunities	<ul style="list-style-type: none"> ▪ Promote a year-round working countryside ▪ Support provision of employment to allow young people to remain within their communities Support indigenous growth of small and micro businesses
7	Economic Growth	
	<i>SEA topic: Population and Material Assets</i>	
	Promote sustainable economic development that can capitalise on the local distinctiveness of the area	<ul style="list-style-type: none"> ▪ Taking advantage of Objective II and Regional assistance from SWRDA ▪ Encourage growth of indigenous companies ▪ Encourage diversification into key growth sectors, including the environmental sector ▪ Provide for the needs of businesses (range of premises, services, infrastructure, skilled workforce) ▪ Enhance the vitality of town, district and local centres and encourage their commercial renewal Provide for the purchase of goods and use of services locally
8	Landscape	
	<i>SEA topic: Landscape</i>	
	Ensure that special and distinctive landscapes, and the features within them, are conserved and enhanced	<ul style="list-style-type: none"> ▪ Preserve and where possible enhance diverse landscape character and value ▪ Maintain a high quality of undeveloped coastal landscapes ▪ Protect and enhance the Areas of Outstanding Natural Beauty (AONB) and Dartmoor National Park Maintain and enhance hedgerow cover and traditional field boundaries
9	Land and Soil Quality	
	<i>SEA topic: Soil and Water</i>	
	Maintain and improve the quality of land and soil in the region	<ul style="list-style-type: none"> ▪ Promote high density development ▪ Actively promote the re-use of previously developed land ▪ Remediate contaminated land Protect the best and most versatile agricultural land
10	Biodiversity	
	<i>SEA topic: Biodiversity, Fauna and Flora</i>	
	Protect and enhance the diversity and abundance of semi-natural habitats and indigenous species	<ul style="list-style-type: none"> ▪ Promote ecologically based land management ▪ Protect and enhance valuable wildlife habitats and species, both those statutorily designated and those of local value ▪ Avoid habitat fragmentation ▪ Protect and enhance those species and habitats identified in the Devon BAP and the National BAP ▪ Protect and enhance the biodiversity value of the Coastline, including estuaries
11	Historic Environment and Cultural Heritage	
	<i>SEA topic: Cultural Heritage</i>	
	Protect and enhance cultural resources	<ul style="list-style-type: none"> ▪ Protect and enhance valued architecture, both buildings (including listed buildings) and their settings ▪ Support locally-based cultural resources and activities ▪ Protect and improve historical and archaeological environment (landscapes, site, buildings and settings),

	SA OBJECTIVE	DECISION-AIDING QUESTIONS
		including Scheduled Ancient Monuments (SAMs) <ul style="list-style-type: none"> ▪ Protect the important geology of South Hams district Protect and enhance Conservation Areas
12	Minerals	
	<i>SEA topic: Material Assets</i>	
	Encourage efficient exploitation of mineral resources	<ul style="list-style-type: none"> ▪ Contribute to the supply of minerals while protecting local communities and the environment ▪ Minimise demand for primary minerals and aggregates ▪ Recycle local stone, where possible, to reinforce local character
13	Energy	
	<i>SEA topic: Material Assets and Climatic Factors</i>	
	Encourage energy efficiency, and promote the generation and use of energy from renewable sources	<ul style="list-style-type: none"> ▪ Avoid exacerbating climate change by reducing energy usage (including through design of new development, and sustainable location of development to encourage accessibility by means other than the car) ▪ Support the generation and use of renewable energy, while protecting local communities and the environment ▪ Promote energy efficiency by locating development in such a way as to minimise the number of trips made by private car Promote energy efficiency in the design of new development
14	Air Quality	
	<i>SEA topic: Air, Climatic Factors and Human Health</i>	
	Protect and improve local and global air quality	<ul style="list-style-type: none"> ▪ Maintain or improve local air quality ▪ Reduce the number of trips made by private car ▪ Reduce CO₂ emissions Consider the longer term effects
15	Waste	
	<i>SEA topic: Water, Soil, Human Health and Population</i>	
	Encourage minimisation, reuse and recycling of waste	<ul style="list-style-type: none"> ▪ Encourage provision for local community recycling and waste management facilities, including on new developments Promote minimisation, reuse and recycling of construction materials and waste
16	Water	
	<i>SEA topic: Water and Climatic Factors</i>	
	Protect and enhance the water environment	<ul style="list-style-type: none"> ▪ Take into account the predicted effects of climate change ▪ Protect and improve freshwater, estuarine and coastal water quality ▪ Consider the close relationship between water quality, quantity and flood risk management ▪ Increase efficient use and reuse of water resources ▪ Promote sustainable coastal and flood risk management that provides for climate change, where appropriate, in new developments Promote Sustainable Drainage Systems

Habitats Regulations Assessment

- 4.7 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Marine Conservation Zones (MCZ).
- 4.8 Articles 6 (3) and 6 (4) of the Habitats Directive require Appropriate Assessment (AA) to be undertaken on proposed plans or projects which are not necessary for the management of the site but which are likely to have a significant effect on one or more Natura 2000 sites either individually, or in combination with other plans and projects.⁴ In August 2007, this requirement was transposed into UK law in Part IVA of the Habitats Regulations (The Conservation (Natural Habitats, & c.)(Amendment) (England and Wales) Regulations 2007). These regulations require the application of Habitats Regulations Assessment to all land use plans that form part of the Local Development Document suite.
- 4.9 The Site Allocation DPDs have been subject to an assessment relating to the Habitats Directive. This assesses the impact proposals in the DPDs may have on the integrity of habitats and species of European importance, known as Natura 2000 sites. The assessment is available as part of the LDF evidence base on the Council's website.

⁴ Determining whether an effect is 'significant' is undertaken in relation to the designated interest features and conservation objectives of the Natura 2000 sites. If an impact on any conservation objective is assessed as being adverse then it should be treated as significant. Where information is limited the precautionary principle applies and significant effects should be assumed until evidence exists to the contrary.

5.0 SUSTAINABILITY APPRAISAL OF IVYBRIDGE DPD: Site Allocations

SA Findings: Vision and Objectives

- 5.1 A compatibility analysis of the emerging Ivybridge DPD Vision and Objectives was carried out using the SA Framework. The detailed findings of these analyses are set out in Appendix IV of this SA Report.

Vision

- 5.2 The compatibility analysis found that the Vision performed well against the sustainability framework objectives by seeking to create a settlement with access to community facilities, housing (particularly affordable housing), and employment for all. Ivybridge currently suffers from outcommuting, particularly to Plymouth and the Vision seeks to change its role to a balanced community and as an Area Centre. It was recommended that to achieve the Vision of serving a hinterland through sustainable transport, a careful transport strategy would need to be adopted to avoid Ivybridge becoming a hub which is accessed by private transport. The provision of local employment and services could have a positive effect by reducing the level of out commuting to other centres.
- 5.3 It is noted in the DPD that Ivybridge has a "large and successful specialist sports community" but that there is also a deficiency of sport, recreation and youth facilities identified in the town's community plan "A Bridge to the Future". The only potentially adverse effects of the Vision were connected to the concept of a sports and leisure hub. Such developments are usually high traffic generators which could attract users from significant distances; therefore their location should be carefully considered to ensure accessibility by walking, cycling and public transport. Some aspects of such uses can also make heavy demands on water supply and this should also be given consideration when determining the type of sports facilities to be provided. However, the proposal may have a positive effect by reducing out commuting to centres such as Plymouth for leisure and recreation. The impact on the River Erme is also considered below.

Objectives

- 5.4 The Ivybridge specific objectives performed well against the SA Framework, particularly in terms of housing, balanced communities, health, energy and employment, which have a synergistic long term effect. The health of residents would likely be improved through the provision of housing and employment, improved air quality and development in locations that allow for walking and cycling. The provision of affordable housing and retention of skilled and young people may encourage new economic development. It was recommended that new development should be accessible by walking, cycling and public transport in order to assist the reduction of

traffic related carbon emissions, which would have positive effects for climate change and human health.

- 5.5 The only identified potential negative effects were through enhancement of access to the River Erme. Increased recreation access could have an adverse effect on biodiversity and water quality; it was recommended that care should be taken that the objectives of the WFD and the South West River Basin Management Plan are not adversely affected.
- 5.6 The element of the Vision which makes specific reference to a sports hub is now reflected as an objective of the DPD.

SA Findings: Development Proposals

- 5.7 As discussed in the methodology in Section 3, an integrated site selection/ SA process was used in order to assess the varying site specific options available to the Council in the preparation of the DPD. The SA Framework was amended to ensure its relevance for site selection for Ivybridge, and this process is documented in the accompanying document: *Sustainability Threshold Assessment of Development Site Options*. This approach addresses the requirement of the SEA Regulations and SA Guidance that options and alternatives are given consideration.

Proposal I1: East of Ivybridge

- 5.8 Generally the site performed well against the SA objectives. There were however, a number of potential negative effects for which mitigation would be necessary. It was considered that overall the proposal can include sufficient mitigation to overcome the sustainability issues raised subject to timely provision of community facilities, particularly the local centre, and careful layout of the site. The development of 100 dwellings and 5ha of employment land by 2016 would have a positive effect on the employment and economic objectives and was identified as being unlikely to raise issues of social balance. The creation of 275 dwellings and 5 ha of employment land, post 2016, could increase "self sufficiency" of Ivybridge and assist in reducing vehicular dependency. Visual impact was identified as a potential adverse effect in earlier SA work and in response strategic landscaping was incorporated into the proposal. However, the SA identified that the proposal for 10 hectares of employment land could still lead to long term adverse effects on the surrounding landscape, including Dartmoor National Park. The SA recommended that a reintroduction of a proposal for provision of allotments would be welcomed and that the site would also benefit from Green Infrastructure to ensure linkages for both walking and cycling access and for biodiversity habitat corridors.

Proposal I2 Ivybridge Town Centre

- 5.9 Overall, the SA found that the proposal performed well against the SA objectives; with positive effects on sustainable development objectives, vitality and viability of the town centre, reduction of air pollution and provision of local employment opportunities to reduce the need to travel. The SA identified the potential for an adverse effect on water quality and biodiversity in relation to increased access to the River Erme. Encouraging recreation and tourist access can conflict with biodiversity objectives and therefore the SA recommended that careful management be employed. Earlier SA work recommended that the impact on the Western Road Air Quality Management Area should be taken into account and this has now been incorporated in the proposal.

Cumulative Effects

- 5.10 Overall the DPD proposes that Ivybridge will accommodate housing and employment development as follows:
- 100 dwellings by 2016
 - 5 hectares employment land by 2016
 - Regeneration of town centre.
 - 325 dwellings post 2016
 - 5 hectares employment land post 2016
- 5.11 The current population is approximately 12,500 with a projected increase to 2026 of approximately 7%. Ivybridge will therefore experience a relatively modest level of development compared to other South Hams towns which should have no significant negative effects and should help to address existing sustainability issues.
- 5.12 Ivybridge has an AQMA and as such cumulative traffic increases should not exacerbate the situation. The employment land to residential land ratio is greater than in the other centres and is designed to reduce the high levels of outcommuting. Although Proposal I1 is for a mixed use site there may be the indirect negative effect of increasing internal commuting across Ivybridge so walking and cycling routes will be essential to encourage less reliance on the private vehicle. Where possible, i.e. in the town centre developments, car park free developments should be encouraged. Likely further adverse cumulative effects from this development include cumulative effects on landscape and soils; increased pressure on water resources and increased energy use. Positive effects are likely for affordable housing, economy and employment.

Progression of SA Recommendations

- 5.13 SA was an integral and iterative part of the formulation of the site allocations DPD and the table below records changes which have been made in response to recommendations from interim SA work on an earlier version of the DPD.

Table 2: Sustainability Appraisal of the Ivybridge Site Allocations DPD – SA findings.

Summary of SA/SEA Findings	Reasons why comments have/have not been taken on board
<p>The Vision for Ivybridge</p> <p>Vision accords with the sustainability framework objectives. The only identified potential for adverse effects are connected to the concept of a sports and leisure hub. Such developments are usually high traffic generators; therefore their location should be carefully considered.</p>	<p>Support welcomed. Comments noted regarding location of sports and leisure hub. Location is subject to analysis through masterplanning process.</p>
<p>The Objectives for Ivybridge</p> <p>The objectives perform well against the SA Framework. The only negative potential effects are through enhancement of access to the River Erme. Increased recreation access can have an adverse effect on biodiversity and water quality; care should be taken that the objectives of the WFD and the South West River Basin Management Plan are facilitated.</p> <p>The element of the vision which makes specific reference to a sports hub is not reflected as an objective of the DPD.</p>	<p>Comments noted.</p> <p>Reference to sports hub is included as part of objective IO6.</p>
<p>Proposal I1: East of Ivybridge</p> <p>The visual impact of the proposal could be further considered and that the need for structural landscaping and integration should be highlighted in the proposal rather than briefly mentioned in the supporting text.</p>	<p>Comments noted. A clause has been added to the proposal on strategic landscaping.</p> <p>There is insufficient evidence and policy basis to require</p>

A requirement for the provision of allotments was originally included in the proposal and the reintroduction would be welcomed to progress health objectives.	allotment provision in the proposal. However, provision can be sought.
Proposal I2: Ivybridge Town Centre Performs well against STA criteria and SA objectives.	Comments noted.

6.0 IMPLEMENTATION AND MONITORING

6.1 SA monitoring should be uncomplicated and integrated with the monitoring of the LDF. The SA Scoping Report (2005) for the LDF suggested targets and indicators, and as a result of consultation further refinement of possible SA indicators and targets were published in the Final SA Report (January 2006) with the Core Strategy. Particularly relevant indicators for this DPD could include the following:

- Mix of housing completed by house size and house tenure
- Supply of affordable housing
- House prices and affordability
- Percentage of new and converted dwellings built on previously developed land
- Provision for on-site renewable energy generation to contribute to the development's energy requirements
- Amount of land developed for employment by type
- Percentage of developments and buildings meeting 'excellent' or 'very good' BREEAM and Code for Sustainable Homes level 3 and above
- Number of features of historic and cultural interest protected
- Proximity of new housing to local facilities
- Loss of existing services and facilities
- New retail and office development in town centres
- Percentage of development with Sustainable Drainage Systems
- Town centre vitality
- Achievement of Biodiversity Action Plan targets

APPENDICES

- I Review of Relevant Plans and Programmes (work undertaken in 2005) & update (2009) (available separately)
- II Collation & Analysis of Baseline Information (work undertaken in 2005) & update (2009) (available separately)
- III Update to the Scope of the SA/SEA (January 2009) (available separately)
- IV SA of Vision and Objectives (attached)
- V SA of Development Proposals (attached)

Available separately in the evidence base to accompany the DPD and SA

Sustainability Threshold Assessment of Development Site Options

Ivybridge Site Allocations DPD
Appendix IV: SA of Vision and Objectives

	SA Framework Objectives															
	1. Balanced Communities	2. Access	3. Housing	4. Quality of Built Environment	5. Health	6. Employment	7. Economic Growth	8. Landscape	9. Land and Soil Quality	10. Biodiversity	11. Historic / Cultural Heritage	12. Minerals	13. Energy	14. Air Quality	15. Waste	16. Water
The Vision for Ivybridge																
The needs of all can be met locally, particularly for affordable homes and new jobs;	+	+	++	+	+	+	+	0	0	0	0	0	+	+	+	+
The town centre is regenerated, taking advantage of its riverside setting and industrial heritage;	+	0	+	+	0	+	+	0	0	0	+	0	+	0	0	0
Its role as a sports and leisure hub is enhanced;	+	0	0	0	+	+	+	±	0	±	0	0	-	0	0	-
Its environment and role as the 'Gateway to the Moor' are protected and enhanced	0	0	0	+	+	+	+	+	+	+	+	0	0	0	0	0

The town serves an expanding hinterland through sustainable transport links, particularly enhancing the role of the railway station;	0	+	0	0	+	+	+	0	0	0	0	0	-	-	0	0
Public space provides a focus and heart to town life;																
Commentary																
<p>Generally the vision accords with the sustainability framework objectives by seeking to create a settlement with access to community facilities, housing, particularly affordable housing, and employment for all. Ivybridge currently suffers from outcommuting, particularly to Plymouth and the vision seeks to change its role to a balanced community and as an Area Centre. To achieve the vision of serving a hinterland through sustainable transport a careful strategy will need to be adopted to avoid Ivybridge becoming a hub which is accessed by private transport. However the provision of local employment and services could reduce the level of outcommuting to other centres.</p> <p>It is noted in the DPD that Ivybridge has a “large and successful specialist sports community” but that there is also a deficiency of sport, recreation and youth facilities identified in the town’s community plan “A bridge to the Future”. The only identified potential for adverse effects of the vision are connected to the concept of a sports and leisure hub. Such developments are usually high traffic generators which can attract users from significant distances; therefore their location should be carefully considered to ensure accessibility by walking, cycling and public transport. Some aspects of such uses can also make heavy demands on water supply and this should also be given consideration when determining the type of sports facilities to be provided. However the proposal may reduce outcommuting to centres such as Plymouth for leisure and recreation. The impact on the River Erme is also considered below.</p>																

		SA Framework Objectives															
The Objectives for Ivybridge		1.Balanced Communities	2.Access	3.Housing	4. Quality of Built Environment	5. Health	6.Employment	7.Economic Growth	8.Landscape	9.Land and Soil Quality	10.Biodiversity	11. Historic / Cultural Heritage	12. Minerals	13. Energy	14. Air Quality	15. Waste	16. Water
IO1	Improve the self sufficiency of Ivybridge and give it an identifiable "heart".	+	+	●	0	+	+	+	0	0	0	?	0	●	+	●	●
IO2	Provide for business growth and development that supports the regeneration of Ivybridge.	+	+	0	0	+	+	+	?	?	?	0	0	0	?	?	?
IO3	Provide affordable housing to meet the needs of the Ivybridge area.	+	?	++	?	+	●	●	?	0	0	0	0	0	0	0	0
IO4	Locate housing, employment and community facilities that reduce the need to travel.	+	+	●	0	+	●	●	+	+	+	0	0	+	+	●	●
IO5	Improve focus and enhance access to the River Erme.	0	0	0	+	●	?	?	●	0	-	0	0	0	0	0	-
Commentary		<p>The Ivybridge specific objectives perform well against the SA Framework particularly in terms of housing, balanced communities, health, energy and employment which have a synergistic impact. The health of residents is improved through the provision of housing and employment and improved air quality and development locations that allow walking and cycling. The provision of affordable housing and retention of skilled and young people may encourage new economic development. Careful location of</p>															

new development where there is access to walking, cycling and public transport will help to reduce traffic related carbon emissions which will have positive implications for climate change and indirect benefits for human health.

The only identified negative potential effects are through enhancement of access to the River Erme. Increased recreation access can have an adverse effect on biodiversity and water quality; care should be taken that the objectives of the WFD and the South West River Basin Management Plan are facilitated.

The element of the vision which makes specific reference to a sports hub is now reflected as an objective of the DPD.

Key to Compatibility Analysis	
++	Strongly Compatible
+	Compatible
-	Incompatible
--	Strongly Incompatible
?	Uncertain
0	Not relevant to SA Objective

Ivybridge Site Allocations DPD
SA Report Appendix V: Detailed SA Findings of Proposals

For each proposal, the findings of the STA process is summarised and the overall colour coded assessment of the site is reported. The STA site numbers are listed for cross-referencing.

Key findings from the SA process are recorded as a commentary and any recommendations from the SA to improve the sustainability of the proposal are set out at the end of each matrix.

Proposal I1: East of Ivybridge	
Mixed use development is proposed, to include:	
<ul style="list-style-type: none"> ▪ About 100 dwellings and about 5 hectares of employment land by 2016; ▪ Beyond 2016, about 275 dwellings and about 5 hectares of employment land; ▪ A local neighbourhood centre providing for small scale daily shopping and community needs; ▪ Provision for retention, maintenance and development of park and ride operations in association with the railway station; ▪ About 0.6 hectare of play provision and 1.3 hectare of other public space; ▪ Contribution to the town's development as a sports and leisure hub; ▪ Strategic landscaping measures to address the site's scale and location; ▪ Cycle and footpath provision including enhanced access to the town centre; and ▪ Measures to mitigate impact on the Western Road Air Quality Management Area. 	
Development of this area should accord with a Masterplan previously approved by the Council.	
STA Summary (Site 3) Ruff Lane	
STA Summary (Sites 4 and 5) Park and Ride Site, Exeter Road & Exeter Road, West of Park and Ride	
STA Summary (Site 6) Exeter Road, north of Rugby Ground	
STA Summary (Site 7) Rugby Football Ground and land east of Godwell Lane	
STA Summary (Site 18) Land south of Torrhill Farm	
SA/SEA Findings	

The proposal comprises a group of smaller sites which were individually subject to the Sustainability Threshold Assessment process (STA). The STA illustrates that there are no absolute sustainability constraints but there are sustainability issues for which mitigation is considered to be achievable and others where mitigation is considered to be problematic. However reasons for rejecting land to the north, south and west of the town are clearly stated.

Ivybridge currently has a population of approximately 12,500 and an increase of 100 dwellings by 2016 accompanied by a 5 ha employment allocation is not considered to raise issues of social balance and will progress employment and economic objectives. However a further 275 dwellings and another 5 ha of employment land is proposed post 2016 and it will be important that the community facilities sought are provided at an appropriate time rather than at the end of the development period. This mixed development should in the long term increase the “self sufficiency” of Ivybridge and decrease dependence on the private vehicle.

Much of the northern part of the site is assessed as having good access to key services and facilities via public transport. Constraints on the site generally are considered to be pedestrian access to facilities. It is noted that the supporting text requires this to be addressed through a comprehensive site layout designed to prioritise the needs of the pedestrian (and cyclists) by the provision of safe and well linked routes through the site. Earlier SA work recommended that the impact on the Western Road Air Quality Management Area should be taken into account and this has now been incorporated in the proposal. Improvements to the park and ride system will also increase the potential to improve air quality in the town.

Visual impact is also raised as concern in the STA and in response to comments in earlier SA work, strategic landscaping is now incorporated in the proposal. However, the proposal for 10 hectares of employment land could lead to some buildings of a significant scale with potential to have a long term adverse effect on the surrounding landscape. This relates to the Dartmoor National Park in the north and the wider landscape to the south so the positioning and design of the employment land will be crucial to avoiding adverse effects.

The proposal protects the sports pitches to the north of Exeter Road so the loss of sports pitches noted in the STA will not occur.

Recommendation

- A requirement for the provision of allotments was originally included in the proposal and the reintroduction would be welcomed to progress health objectives. It is considered that overall the proposal can include sufficient mitigation to overcome the sustainability issues raised subject to timely provision of community facilities, particularly the local centre, and careful layout of the site.
- The scale of the site would also benefit from Green Infrastructure to ensure linkages for both walking and cycling access and for biodiversity habitat corridors in and around the site, and to help the landscape accommodate the development.

Proposal I2 Ivybridge Town Centre

Comprehensive mixed use regeneration is proposed beyond 2016, to incorporate commercial, residential and community uses and include:

- Maintenance of at least the existing amount of retail floor space, including a supermarket, offices and workshop units;
- About 50 dwellings;
- Enhanced access to and focus on the River Erme;
- Refurbishment of the leisure centre;
- Retention of existing levels of car parking;
- Contribution to the town's development as a sports and leisure hub;
- Enhanced access between the area south of the A38 and the town centre; and
- Measures to mitigate impact on the Western Road Air Quality Management Area.

Development of this area should accord with a Masterplan previously approved by the Council.

STA Summary (Site 1) Town Centre

SA/SEA Findings

The vision for Ivybridge centre has been long established and comprises redevelopment and regeneration. The outlined

principles for any future development perform well against the SA Framework objectives and should progress the aim of sustainable development and has the potential to improve some existing issues such as the vitality and viability of the town centre, reduction of air pollution and provision of local employment opportunities to reduce the need to travel.

The inclusion of 50 dwellings in the town centre will progress the housing and community objectives and have indirect benefits for town centre vitality and a sense of safety for those using the town centre in the evenings.

Earlier SA work recommended that the impact on the Western Road Air Quality Management Area should be taken into account and this has now been incorporated in the proposal.

The proposal generally performs well against STA criteria and SA objectives but there is some potential for adverse effect on water quality and biodiversity in relation to increased access to the River Erme. Encouraging recreation and tourist access can come into conflict with biodiversity objectives and should be carefully managed. (Erme Estuary Management Plan).