



**South Hams
District Council**

**SUSTAINABILITY APPRAISAL / STRATEGIC
ENVIRONMENTAL ASSESSMENT of
SOUTH HAMS SHERFORD NEW
COMMUNITY AREA ACTION PLAN
(SUBMISSION STAGE)**

SUSTAINABILITY APPRAISAL REPORT

APPENDIX III

June 2006

Prepared by

enfusion



APPENDIX III: SUMMARY OF RESPONSES TO CONSULTATION

1. **Comments on Sustainability Appraisal Scoping Report**
2. **Comments on AAP Preferred Options & Sustainability Appraisal**

1. COMMENTS ON SUSTAINABILITY APPRAISAL SCOPING REPORT

COMMENT	RESPONSE/ACTION
English Nature	
Enclosed ' <i>Strategic Environmental Assessment and Biodiversity: Guidance for Practitioners</i> ' which has been produced by English Nature and the Environment Agency, with others.	Noted
Advised that the Strategic Sustainability Assessment for the South West Regional Spatial Strategy has an overview of all the issues addressing the South West including South Hams, and provides a good lead on SSA methodology for the whole region.	Noted
The SA/SEA should consider the effect of development on biodiversity and landscape. First, in terms of the negative effects of land take and second in terms of the positive potential for enhancement through planning gain.	Noted. The need to both protect and enhance biodiversity and landscape is incorporated in the SA Framework
It would seem that the document of October 2004 Draft SA of the issues and options should have been produced subsequent to this SA/SEA scoping document.	Agreed that ideally this would have been the preferred approach. However, interim guidance from ODPM on SA of LDFs (April 2005) states that the requirement initially set out in good practice guidance to publish an Initial SA Report on LDD issues and preferred options is no longer necessary
Appendix I and II are not supplied with the document	As set out in the Scoping Report, these are available upon request
Where the SA/SEA identifies plans, programmes, strategies or policies within the LDF which are likely to have a negative effect on the environment, small or large, then appropriate mitigation and compensation will need to be identified.	Where likely negative effects on the environment are identified during appraisal, potential for mitigation will be considered
The use of objectives, indicators and targets for sustainability with which to assess and monitor LDF as set out in table 1 and 2, would appear to be a good approach.	Noted
Page 2 – document reference 5 is missing	Noted

COMMENT	RESPONSE/ACTION
<p>Additional key sustainability problems, or objectives or issues relevant to land use planning for which sustainability objectives should be developed?</p> <p>Climate change is a very large issue facing us nationally and internationally. The LDF will contribute towards achieving the government's targets on this through several means; for instance by strategically planning communities it can reduce transport requirements. Climate change should be seen as a sustainability objective as should transport.</p>	<p>The significance of climate change is appreciated. It is considered that the main means by which the LDF can contribute to the minimisation and management of the effects of climate change are with respect to the location of development (with a view to reducing the need to travel by private car) and the water environment. Both of these aspects are included in the SA Framework of objectives and decision aiding questions, therefore no change to the SA Framework is proposed.</p> <p>With respect to transport, the key sustainability issues are considered to be covered by the objective relating to Access (Objective 2), Energy (Objective 13) and Air Quality (Objective 14), therefore no change to the SA Framework is proposed.</p>
<p>Are there any relevant decision aiding questions which could help with the Appraisal and what the LDF can do?</p> <p>Table 1, Objective 10 (Biodiversity), Decision-aiding question 4 This mentions species in the Devon BAP only. The District Council also has a duty to protect all species in the National BAP. The mention is of ecologically based land management. South Hams has a considerable amount of coastline including estuaries which are extremely important for biodiversity.</p>	<p>Change to decision aiding question 4 proposed as follows:</p> <p>Protect and enhance those species and habitats identified in the Devon BAP and the National BAP</p> <p>Additional decision aiding question proposed as follows:</p> <p>Protect and enhance the biodiversity value of the Coastline, including estuaries</p>
<p>Is there any further information available that could be used to measures whether sustainability objectives are being progressed?</p> <p>Objective 8 (Landscape) – area/change in designations would be a very crude way to monitor landscape. A better way would be to monitor changes in landscape through land-take from development etc by more direct means such as fixed point photography or aerial photography.</p>	<p>Noted and will be considered in proposing monitoring measures. Constraints on resources for undertaking photography will also need to be taken into account, although potential for collaboration between stakeholders could be investigated</p>
<p>Which Targets and Indicators are most appropriate for future measurement of progress towards each sustainability</p>	<p>Noted.</p> <p>These recommendations will be</p>

COMMENT	RESPONSE/ACTION
<p>objective?</p> <p>Landscape – Lowland heath and potential restoration areas are scarce in South Hams District. More sensible landscape definitions should be used. These would include hedgerows, coastal cliffs/maritime grasslands, meadows and woodland (woodland is stated in the draft). South Hams DC and the AONB unit could provide further detail on this.</p> <p>Biodiversity – Changes in the Devon and <u>National</u> BAP species and habitats, Achievement of Biodiversity Action Plan objectives/targets, Monitoring of improvements or contribution to biodiversity, particularly BAP species and habitats, achieved through planning and development. This would include S106 agreements, conditions on planning permissions and any other form of planning gain. Target habitats should include land, coastal and marine environments as well as earth science interests.</p>	<p>incorporated in proposed monitoring measures.</p>
<p>English Heritage</p>	
<p>Objective 11 Cultural Heritage The heading ‘protect and enhance cultural heritage’ is very broad encompassing things other than the historic environment. The historic environment is more than a cultural asset, it is an important driver for economic regeneration and for building social cohesion. Moreover, the decision aiding questions, which are useful, are all ‘historic environment’ based and therefore reference should be made explicitly to that term.</p>	<p>Amended objective proposed as follows:</p> <p>Protect and enhance historic and cultural resources</p>
<p>Signpost to ‘Heritage Counts: State of the Historic Environment’ (available via www.heritagecounts.org.uk (to inform monitoring)</p>	<p>Noted and will be considered when preparing monitoring proposals</p>
<p>Recommendations for the identification and appraisal of potential impacts on the historic environment</p>	<p>Noted</p>
<p>Signpost to ‘Streets for All’ guidance providing advice and best practice on the management of the Region’s streetscapes</p>	<p>Noted</p>
<p>South West of England Regional Development Agency</p>	

COMMENT	RESPONSE/ACTION
General support for the contents of the SA/SEA documents	Noted
In relation to the economy the document does not appear to make reference to the Regional Economic Strategy (RES), which is one of the suite of documents under the 'umbrella' of the Integrated Regional Strategy (IRS) for the South West. This document provides a sustainable approach to economic development for the Region identifying many issues that will need to be addressed in order to build a successful region.	The considerable relevance of the RES is noted. To avoid repetition and link with other relevant work being undertaken (and in accordance with advice from the SW Regional Assembly), the Scoping Process for the South Hams SA refers to the Review of Plans and Programmes undertaken as part of the Strategic Sustainability Appraisal of the Regional Spatial Strategy. This Regional Review summarised the provisions of the Regional Economic Strategy.
In relation to economic trends the document does not appear to consider the research that has been carried out by consultants to inform the emerging RSS, and the review of the RES. This information was submitted to Plymouth (and partners) in order to inform the preparation of the sub-regional study and has identified that significant growth is expected in the economy of Plymouth to 2026.	Propose to collate this additional information to contribute to the baseline
With reference to the new community at Sherford, it is considered that this should be promoted as 'SMART Growth' in conjunction with and complimentary to the urban regeneration proposals being promoted for Plymouth.	Noted
Scott Wilson Ltd	
Note ODPM has issued SA of RSS and LDF Interim advice note on frequently asked questions (April 2005) – which alters requirements for stages B and C of the SA.	Noted
Countryside Agency (Response Received Subsequent to Deadline)	
Information sources on landscape character and quality is available at: http://www.countryside.gov.uk/LivingLandscapes/countryside_character/south_west/index.asp and http://www.ccnetwork.org.uk	Noted, and will be considered in development of monitoring strategy
Devon County Council is in the process of carrying out a new landscape assessment for the county, involving South Hams District	Noted

COMMENT	RESPONSE/ACTION
officers	
Information about how the landscape is changing is available at: http://www.countryside-quality-counts.org.uk/indepth.htm	Noted, and will be considered in development of monitoring strategy
The Agency recommends that information contained within the South Devon AONB Management Plan be incorporated. Can be viewed under News and Publications at: http://www.southdevonaonb.org.uk	Noted (although not in time to inform appraisal)
South Hams District also contains a portion of defined Heritage Coast, which could be affected by proposals contained within the LDF. More details can be found on the AONB website (link above).	Noted. Heritage Coast has been taken into account during SA.
South Hams also hosts the South West Coast Path (SWCP), a National Trail, which should be taken into consideration. More information can be obtained from the SWCP team c/o Devon County Council, Matford Lane Offices, County Hall, Exeter, EX2 4QW, tel: 01392 383560	Noted (although not in time to inform appraisal)
Open Access mapping has been completed for the South West Region, and a definitive map has been produced. We therefore recommend that you refer to the following link to provide this environmental information: http://www.ca-mapping.co.uk/mapping/default.htm	Noted (although not in time to inform appraisal)

2. COMMENTS ON AAP PREFERRED OPTIONS & SUSTAINABILITY APPRAISAL

COMMENT	RESPONSE / ACTION
Tetlow King	
Concerned the AAP is not based upon an entirely sound sustainability appraisal and is therefore not a sound emerging DPD.	The Sustainability Appraisal has been carried out by an independent external consultancy and the Council has no reason to doubt the soundness of the Appraisal.
Generally support the document. Some of the sustainability objectives are not properly carried through to the proposals of the AAP. Alternative scenarios should have been more fully tested to provide a sounder base for the preferred options The AAP will not achieve a balanced mixed use development, nor a mixed type, tenure development in mixed use	The opinions expressed are not supported. A more detailed explanation of the proposal is now contained in the AAP which should assist in understanding what exactly is being proposed.

COMMENT	RESPONSE / ACTION
<p>areas (para 2.7 objectives). Nor will it achieve the objectives of promoting community viability and balance (para 4.40) as the proposed affordable housing targets are too high.</p>	
<p>Plymouth & South West Co-op</p>	
<p>Alternative boundary and form of development. Analysis of alternative sites lacked robustness. - see original submission.</p>	<p>This alternative proposal was considered as part of the EbD process and rejected in favour of the site now contained in the AAP. The process of arriving at that decision is considered exhaustive and robust.</p>
<p>Environment Agency</p>	
<p>The SA/SEA should recognise that flood risk should be incorporated. Additionally we would welcome some form of assessment of what renewable resources would be appropriate for the development, including the possibility of district heating systems.</p>	<p>There is very limited flood risk on the site (as advised by the EA), due to the local topography and hydrology, and the EA are closely involved in the ongoing design work. Work on renewable energy opportunities has been incorporated in the Submission stage of the AAP in paras 7.4-7.15 7.33-7.42 and Policies SNC2 and SNC5.</p>
<p>Hopwood and Swallow</p>	
<p>If the preferred approach for employment land provision is to disperse employment development according to need but within existing settlements, this should not preclude or dilute the allocation of significant employment sites in appropriate sustainable locations such as at Langage. The environmental impact of such increased provision should be carefully assessed and appropriate sites should be selected in order to minimise environmental impact and development should accommodate optimum mitigation in relation to environmental damage.</p>	<p>Comments noted. A balanced employment strategy will contain both strategic sites such as Langage as well as smaller sites within or as close as possible to existing or proposed centres of population. Sherford will not provide strategic site allocations but will provide a mixed use development incorporating employment sites. Managing such sites to avoid environmental impact on neighbouring development is a key part of successful mixed use developments.</p>
<p>English Nature</p>	
<p>The Yealm estuary is now fully designated as a SAC, part of Plymouth Sound SAC.</p>	<p>Comment noted and text amended.</p>
<p>This addresses the work done on monitoring presumably for the EIA required for the planning application.</p>	<p>Agreed.</p>