



**South Hams
District Council**

**SUSTAINABILITY APPRAISAL / STRATEGIC
ENVIRONMENTAL ASSESSMENT of
SOUTH HAMS CORE STRATEGY
(SUBMISSION DOCUMENT)**

SUSTAINABILITY APPRAISAL REPORT

APPENDIX III

January 2006

Prepared by

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APPENDIX III: SUMMARY OF RESPONSES TO CONSULTATION

SCOPING CONSULTATION

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
Additional key sustainability problems, or objectives or issues relevant to land use planning for which sustainability objectives should be developed? Climate change is a very large issue facing us	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

Comment	Response/Action
<p>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>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 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</p>	<p>Noted.</p> <p>These recommendations will be incorporated in proposed monitoring measures.</p>

Comment	Response/Action
<p>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>	
English Heritage	
<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>
South West of England Regional Development Agency	
<p>General support for the contents of the SA/SEA documents</p>	<p>Noted</p>
<p>In relation to the economy the document does not appear to make reference to the Regional Economic Strategy (RES), which is one of the</p>	<p>The considerable relevance of the RES is noted.</p>

Comment	Response/Action
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.	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 complimentarily 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 officers	Noted
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	Noted (although not in time to inform

Comment	Response/Action
contained within the South Devon AONB Management Plan be incorporated. Can be viewed under News and Publications at: http://www.southdevonaonb.org.uk	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)

PREFERRED OPTIONS CONSULTATION

Comment	Response/Action
Environment Agency	
10 Biodiversity The questions are good objectives for biodiversity but they do not seem to have any relationship in the Core Strategy. The SEA should conclude by saying that biodiversity issues need to be addressed throughout the LDF at a strategic level so that it feeds through all the LDF documents. The SA/SEA assesses the impacts of the Core Strategy on biodiversity and BAP targets but does not mention weaving BAP targets into the LDF via the Core Strategy.	The report states that the consideration of impact on national and local BAPs is an important decision adding question. As such it will be used in the forthcoming appraisal of the proposed LDF documents and will be an important factor throughout the process.
16 Water The phrase where appropriate suggests that in some cases you do not need to take account of climate change which is incorrect. The last two bullet points should read: Promote sustainable coastal and flood risk management that provides for climate change Incorporate Sustainable Drainage Systems	It is considered that these questions in their current form adequately highlight the importance of consideration of the need for coastal and flood risk management and the incorporation of SUDs.

Comment	Response/Action
wherever appropriate.	
Totnes & District Sustainability Group	
Strongly support the decision aiding questions and the production of a guide on Sustainable Construction.	Noted
A design guide for the AONB would be good especially linked to renewable energy use.	Noted
Strongly support comments on Policies CS12 and CS13.	Noted
Support wholeheartedly the proposed indicators and targets except for: Why is the target of 10% on site renewable energy when it is higher in the SPG for larger sites. Under energy efficiency why aim at 40%? Why not have 100% meeting “good” standards.	The SPG referred to was in draft form and has not yet been adopted. The Submission version of the Core Strategy no longer contains a specific renewable energy target, however, in major developments such as Sherford new community the relevant DPD should include specific targets. Energy efficiency cannot currently be secured through planning policies and as such 40% is considered to be an achievable target.
Taylor Woodrow Developments	
As a result of previous omission and inconsistencies, the sustainability appraisal assumes that access-wise the policy promotes “viable self-sustaining communitiesenabling people to live near where they work” including at Newnham. Nowhere is this proven.	See below
Appendix VI /Policy CS1 The statement that Policy CS1 “makes a rational and sustainable choice for the community as a whole” does not tally with the decision that Woolwell is not considered suitable for housing allocation in contrast to Newnham which has no key settlement designation and is remote from facilities. The SA does not pick up inconsistencies in the Core Strategy and this should be addressed.	See below
Appendix IV/ Housing Land Distribution The issue of the most sustainable location for the urban extension to Plymouth has been omitted in the SA. This is especially evident in the fact that the “recommendations” section does not mention Newnham. An appraisal of the broad location options for the outstanding PUA housing requirement should be carried out.	See below
As above and suggesting that the comparative	See below

Comment	Response/Action
merits of Newnham and Woolwell should be assessed.	
<p>Para 5.20</p> <p>The document is incorrect stating that apart from the new community at Sherford, the Structure Plan does not require any other housing development on sites in South Hams. It is necessary not appropriate to allocate another 450 dwellings. Affordable housing will be achieved through the allocation of any site.</p>	<p>Agreed. Over and above the allocation at Sherford, a further 500 dwellings are required to meet the Structure Plan housing requirement.</p> <p>Recommendation: In relation to paragraph 5.20 of the SA of the Core Strategy Preferred Options version, the Submission version of the Core Strategy no longer allocates Newnham as the site to accommodate 450 dwellings in the South Hams part of the Plymouth PUA. Instead, the precise location of these dwellings will be determined through the Plymouth Urban Fringe DPD.</p>
<p>Para 5.2</p> <p>A proper assessment of alternative sites to fulfil the housing requirement for Plymouth PUA has not been carried out.</p>	See above
Support the objectives and decision aiding questions devised as the basis for appraisal of the core strategy.	Noted
Object to the addition of “high trip generating” to the objective at paragraph 6.4	This accords with PPG advice that high trip generating uses should only be permitted in accessible locations.
Devon Local Access Forum	
Support quality of the Built Environment and Health Policies relating to walking, cycling, and the quality of green and open spaces.	Support welcomed
The section on Access would be helpful to include cycleways as well as public transport	Comments noted. However, this is already covered under ‘Health’.
A statement, either under health or environment, should relate to a decision-aiding question on the protection and improvement of rights of way and other access opportunities. The final rights of Way Improvement Plan, shortly to be produced by Devon County Council, will inform this process.	Comments noted. However, this is already covered under ‘Health’.
South Hams Sustainability Group	
Strong support for all SA Framework Objectives with proposed additional bullet points. Employment - add support traditional	Support welcomed. Changes have been made to the final SA report to incorporate several of these comments.

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<p>land based industries, fishing and farming. Land and Soil Quality - add control soil erosion and sedimentation, and add restoration of land disturbed by pipelines and mineral workings. Biodiversity - add protect geodiversity (geology, geomorphology and soils). Energy-add ensure communities benefit from renewable energy developments, and add provide design guidelines, and add increase awareness of benefits of energy saving, and finally Air Quality add reduce N2O, methane emissions</p>	<p>In some cases, however, the suggestions whilst welcomed are a little too detailed.</p>
English Nature	
<p>Core Strategy proposed indicator targets do not include environmental indicators - despite environment issues being best managed spatially.</p>	<p>New indicators have been incorporated into the final SA including biodiversity, and water, which address this point.</p>