



**South Hams
District Council**

**SUSTAINABILITY APPRAISAL /
STRATEGIC ENVIRONMENTAL
ASSESSMENT of
SOUTH HAMS CORE STRATEGY
(PREFERRED OPTIONS)**

SUSTAINABILITY APPRAISAL REPORT

APPENDIX V

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**APPENDIX V
 INITIAL SA OF CORE STRATEGY (PREFERRED OPTIONS)
 OBJECTIVES, SPATIAL STRATEGY, AND CORE POLICIES**

INITIAL SA OF CORE STRATEGY OBJECTIVES

The table below provides a summary of which SA objectives are progressed by which Core Strategy objectives. (For the purpose of the table, we have assigned letters A-R to the Core Strategy objectives). As shown, at least one Core Strategy objective is relevant for each SA objective – indicating relatively good coverage of sustainability issues. However, some are much more rigorously addressed than others. Some SA objectives are only implicitly progressed (see more detailed comments Section below) with no explicit mention for example of minerals, waste, walking and cycling, and flooding. The Council might consider implicit progression to be appropriate in some instances to allow the Core Strategy objectives to remain succinct and focused upon priorities. However, some recommendations are provided where we consider elaboration might prove beneficial.

	SA Objective	Core Strategy Objectives
1	Balanced Communities	D, E, F, K, L
2	Access	D, E, J, K, L, M
3	Housing	A, B, D, E
4	Quality of the Built Environment	C, D, E, L, M, Q, R
5	Health	Q
6	Employment	D, G, H, I
7	Economic Growth	F, G, H, I, K, Q
8	Landscape	N, R
9	Land and Soil Quality	E, R
10	Biodiversity	I, O, R
11	Cultural Heritage	P
12	Minerals	C, R
13	Energy	C, M
14	Air Quality	M
15	Waste	R
16	Water Resources & Water Quality	C, Q, R

The following comments discuss aspects of the Core Strategy Objectives where coverage might be improved. Where no comments are made, we consider the relevant SA objective to be rigorously progressed.

SA Objective 4 (Quality of the Built Environment)

- Economic objectives could include requirement for high quality economic developments (would improve consistency since housing objectives already include requirement for high quality housing developments)
- Protecting green open spaces not explicitly progressed, - could be added in objective Q

SA Objective 5 (Health)

- No mention of walking and cycling
- No mention of crime and fear of crime – but this could be elaborated through policy

SA Objective 6 (Employment)

- Could encourage reuse of Buildings
- Supporting indigenous growth identified as an issue in the SA Framework – perhaps modify objective G accordingly

SA Objective 7 Economic Growth

- Again, could mention supporting indigenous growth as well as growth sectors (modify objective G?)

SA Objective 9 (Land and Soil Quality)

- No mention of Previously Developed Land, contaminated land or agricultural land, but perhaps this is too much detail for Core Strategy objective – and can be elaborated by policy

SA Objective 10 (Biodiversity)

- Objective O only mentions habitat and species *diversity* – could also refer to abundance, and need to prioritise protected, natural or semi-natural habitats and species

SA Objective 11 (Cultural Heritage)

- ‘Historic features’ (objective P) might implicitly include architectural features (such as Listed Buildings and Conservation Areas), but could draw more attention to these

SA Objective 12 (Minerals)

- Minerals not mentioned – could reinforce need to minimise demand eg by recycling local stone in new development (maybe implicit in new development being sustainable, and may be sufficient to elaborate in Policy)

SA Objective 13 (Energy)

- No mention of renewable energy or energy minimisation in new development, but these could be elaborated by policy

SA Objective 14 (Air Quality)

- Could add 'Air' to land, soil and water in objective R

SA Objective 15 (Waste)

- Waste not explicitly mentioned, but may be sufficient to promote minimisation, reuse, and recycling through policy

SA Objective 16 (Water)

- Flooding not explicitly mentioned, nor the need to include water efficiency measures in new development. However, this maybe implicit in sustainable management of water (objective R) and the specifics can be elaborated through policy.

Suggested amendments to address the comments made in Section 2.2 are provided below:

The LDF strategic objectives in relation to housing are to:-

- a) Provide affordable housing to meet the needs of local people;
- b) Meet the strategic requirements for housing;
- c) Secure high quality, locally distinctive, sustainable housing developments;
- d) Promote mixed use, mixed type, mixed tenure schemes; and
- e) Provide for housing at the highest densities suitable for the site.

The LDF strategic objectives in relation to the economy are to:

- f) Regenerate the district's towns, villages and their hinterlands, **and reuse existing buildings where appropriate;**
- g) Provide for business growth and development, **supporting indigenous growth, growth sectors, and** providing year-round sustainable, well-paid employment;
New objective – Secure high quality, locally distinctive, sustainable economic development
- h) Improve the district's economic infrastructure; and
- i) Retain and develop a prosperous working countryside.

The LDF strategic objectives in relation to accessible services are to:

- j) Reduce rural isolation;
- k) Support the role of market towns and other local centres;
- l) Retain existing and promote new local services and facilities **accessible by foot or by bicycle;**
- m) Promote **high trip generating** development at locations accessible by sustainable transport.

The LDF strategic objectives in relation to the environment are to:

- n) Conserve and enhance the quality of the district's countryside and coastal landscapes;
- o) Conserve and enhance the diversity **and abundance** of wildlife, **especially protected, natural or semi natural habitats and species**;
- p) Conserve and enhance the historic and archaeological features of the district, **including valued architectural features**;
- q) Provide for recreational use and enjoyment of the district's towns **and** villages (**including accessible green spaces**), countryside and coast;
- r) Require that new development is of a high quality, respects its location and is compatible with the sustainable management of land, soil, **air** and water.

SPATIAL STRATEGY

Policy CS1 Settlement Designation

The designation of Area Centres and Local Centres is considered to be an effective means of focusing development. The two-tier system should provide a suitable guide for the appropriate extent and type of development to be accommodated within settlements, whilst avoiding being overly prescriptive at this strategic stage. Some more detailed comments relating to the description of the functions of these Area and Local Centres are provided below.

The Area Centres are described as providing *“focal points for the provision of local housing and employment opportunities, education facilities and other local services.”* The Local Centres are described as having an *“important function in providing some services and facilities for their rural hinterlands and should be focal points for a modest scale of development.”* This sets an appropriate context to accommodate the majority of development within Area Centres, with Local Centres playing an important role in the provision of services.

However, it is considered that further elaboration of the type of development to be accommodated in Area and Local Centres is required to adequately convey the principle of the roles of each. Housing, employment opportunities and education facilities provides a useful guide for Area Centres, although 'other local services' could be elaborated. It is considered that 'Some services and facilities' for Local Centres needs to be elaborated. Also, the role of the Local Centres with respect to housing is not clarified. If possible, some clarification of what is or is not likely to be acceptable in villages would be useful.

Perhaps principles of service and facility type could be informed by the frequency of use, for example with local shops being accommodated within Local Centres, and services used less frequently (and requiring a greater number of people to support them) more appropriately allocated within Area Centres.

The accessibility of Area Centres to the communities they serve, including by public transport is a particularly important aspect. The provision of services and facilities within Local Centres is considered to be important not just for the rural hinterland but also the residents of the towns themselves. This is especially important with respect to retaining or providing services within walking or cycling distance of residents, and

negating the need for frequent trips to Area Centres, and the written justification could allude to this.

It is not clear what “*when allocating land for new development, Area Centres should provide a sustainable focus*” is intended to add to the first sentence. Perhaps ‘sustainable’ could be added to the first sentence with the above sentence deleted – eg “*The Area Centres are described as providing focal points for the **sustainable** provision of local housing and employment opportunities, education facilities and other local services.*”

The allocation of Sherford as an Area Centre is considered to be important in ensuring a reasonable level of self-sufficiency for the new community at an early stage in its development, without placing additional burden upon existing services.

Policy CS2 Housing Land Provision

The Council’s approach in providing affordable housing over and above the Structure Plan requirement is considered to be a particularly proactive and positive means by which to address the priority of meeting local housing needs.

The principle of accommodating the majority of dwellings in Area Centres is sound with respect to SA objectives. Although there will inevitably be impacts resulting from land take (such as upon landscape and biodiversity), particularly where it is not possible to accommodate dwelling on previously developed land, the siting of dwellings within or directly adjacent to existing Area Centres will help ensure that these impacts are largely confined to the more built-up areas. This should minimise adverse impacts in more remote areas where new development is likely to be more visually prominent. Accommodating most dwellings in Area Centres will also promote access to services by means other than the private car, as well as support for the viability of services within Area Centres.

The Local Centres are proposed as accommodating little if any more dwellings than the Villages. It is accepted that the Council probably has good reasons for this (backed up by extensive community consultation), and these could be elaborated. The Council may also wish to consider the extent to which the existing population in these settlements is capable of supporting the appropriate level of services and facilities for Local Centres.

The level of provision of affordable dwellings in the Villages is considered to be compatible with SA objectives insofar as it should help meet local needs whilst, with careful siting (in accordance with other LDDs), avoiding serious adverse impacts.

During subsequent LDF development, clearly the Council will need to seek to minimise potential adverse impacts such as visual impacts, especially within the AONB. (This is likely to be a particular issue for Dartmouth, considering its location within the AONB and the number of dwellings to be accommodated). New residential development at Kingsbridge will need to respect the integrity of the Salcombe/Kingsbridge SSSI. The Environment Agency’s indicative floodplain map indicates that there may be particular issues with flooding for Totnes, and new

residential development here will need to be particularly sensitively sited to ensure no net loss of flood storage capacity.

Policy CS3 Employment Land Provision

The Council's approach of accommodating the majority of employment land at Sherford and the Langage Employment Estate is compatible with the Structure Plan requirements, and the principle of developing a 'significant strategic employment site' should assist in securing a well serviced accessible inter-connected employment site to encourage economic growth. The Council has recognised the need to provide for local employment needs in addition to these strategic sites, and the small scale employment land provision elsewhere should assist in meeting these requirements.

The difference in the extent of employment land to be accommodated in the Area Centres, the Local Centres and the Villages seems to be somewhat limited, although it is recognised that there are reasons for this including land availability. These could be further elaborated in the written justification. We note in particular that Torr Quarry and Wrangaton are proposed to accommodate significantly more employment land than the Area Centres, Local Centres or any of the Villages. The reasons for this could usefully be described.

Like the residential development, clearly the Council will need to seek to minimise potential adverse impacts such as visual impacts and impacts upon biodiversity. Development at the Langage Employment Estate will need to be sited particularly carefully with respect to views from the Environmentally Sensitive Area and National Park.

STRATEGIC POLICIES

Policy CS4 Previously Developed Land

- This policy and written justification sets out a realistic approach to accommodating as much new housing as possible on previously developed land.
- The relatively high proportion of development to be accommodated on Greenfield land – especially at Sherford – could be considered to compromise objectives relating to efficient use of land (including agricultural land), as well as landscape and biodiversity. However the accommodation of the development at Sherford is imposed upon South Hams thus these issues are beyond the control of the Core Strategy.
- The policy should encourage conversion of existing buildings which will help ensure that the existing building stock remains in productive use, and will reduce demand for new building materials.

Affordable Housing Written Justification

- The Council's principle of defining local needs by area to ensure that affordable housing is matched in the most effective way with needs is

commended. However, there may be a need to be wary of defining need according to administrative boundaries which may not always coincide with the most urgent needs. The Council may wish to consider permitting a slightly more flexible approach – with the administrative boundaries continuing to provide a guide, but with more flexibility to assess need on a case by case basis.

- Providing flexibility to exceed the strategic housing allocation if sites provide at least 66% of affordable housing is considered a positive approach, acknowledging the key priority of securing affordable housing.

Policy CS5 Affordable Housing on Proposed Sites

- The provision of a mixture of socially rented, affordable for sale and open market housing should promote balanced communities and significantly progress the key priority of addressing the lack of affordable housing.
- The different proportion of affordable housing required at Sherford and on all other sites is appropriate taking into account the extent of new infrastructure and facilities required to be provided at Sherford, especially in conjunction with Policy CS11 which requires that developers bear the cost of infrastructure provision.
- The Council should also bear in mind that the additional housing on all other proposed sites is also likely to entail a need for (albeit more incremental) provision of facilities – and ensure that affordable housing is not pursued at the expense of securing sufficient high-quality infrastructure (including environmental infrastructure such as flood risk management, water efficiency and biodiversity measures). This is in recognition that in the long-term, local communities will be more receptive to accommodating new dwellings if they are carefully implemented and integrated with the local communities. This consideration can probably be sufficiently progressed through other Core Strategy (and other LDD) policies.
- The Council clearly recognises and is appropriately progressing the need to ensure that affordable housing remains affordable in the long-term, to continue to meet local needs.

Policy CS6: Affordable Housing on ‘Windfall’ Sites

- The provision of 50% affordable housing on windfall sites should promote balanced communities and significantly progress the key priority of addressing the lack of affordable housing. The Council might usefully set out the reasons for the differential thresholds at which the policy is triggered in settlements with a population of more and less than 3,000.
- Consideration of the capacity of the whole site is especially useful in ensuring efficient use of land, and the presumption in favour of on-site provision should assist in securing balanced communities.

Development in Towns and Villages

- In the paragraph which begins “Within Development Boundaries, development is acceptable in principle” the Council might usefully add impacts upon the receiving environment to the range of detailed planning considerations listed.
- The delineation of the edge of the built-up areas should progress the sustainability objective of ensuring that special and distinctive landscapes are conserved.

Policy Areas

- The designation of Employment Areas will provide the Council with additional control over land use where this is required. In particular, this will contribute to protecting the quality of the built environment (including cultural heritage), and the retention of jobs accessible to residents. Other considerations could be listed here – such as designations of Policy Areas where there are existing or potential problems of congestion, or sites valued locally for their biodiversity. However, we appreciate that the list is not exhaustive and the Council will wish to keep the Core Strategy succinct.

Policy CS7: Development Boundaries

- The approach of the Council in having assessed the capacity of every town and village in the South Hams provides a rigorous approach to ensure that the case by case circumstances of each settlement have been taken into account in the identification of Development Boundaries.
- The Council’s overall enabling approach to development within these Development Boundaries should provide a suitable context from which to ensure that settlements are allowed to evolve to reflect changing circumstances.
- Criteria a-j are effective in progressing many of the SA objectives, especially the quality of the built environment, cultural heritage, biodiversity, landscape, health and employment. It is suggested that a further criterion could be added about safeguarding or enhancing pedestrian routes and cycleways.

Policy CS8 Development Outside the Development Boundaries

- The presumption against development except that which is necessary to enable a living countryside is considered to be a good approach to ensure the protection of the quality of the environment as a priority, whilst accepting that a limited extent development will be beneficial.
- The sentence “*In all cases, the development will only be permitted providing that there would be little adverse effect on the character, appearance, wildlife or amenities of the area*” is considered somewhat negative, and whilst not precluding beneficial impacts, does not actively encourage them. An

alternative form of wording could be: *“In all cases, the development will only be permitted providing that there would be little adverse effect on the character, appearance, wildlife or amenities of the area, and where possible, development should seek to contribute positively to its surroundings.”*

- In the final sentence of the Policy, SA objectives might be better progressed by substituting ‘or’ for ‘and’ such that development would support the area’s conservation or enhancement **and** would foster its social and economic wellbeing (with the final part of the sentence deleted).

Policy CS9 Exception Sites

- The inclusion of the Policy on Exception Sites will provide a positive context by which to address any exception site proposals if they do come forward, and ensuring 100% affordable housing is considered appropriate taking into account their location outside of Development Boundaries. The requirement for the site to adjoin a Development Boundary (criterion b) might restrict the overall potential to secure affordable housing by means of exception site provision.

Policy CS10 Design of New Development

- In the written justification, it is suggested that the sentence *“Through the policies contained in the LDF, high quality inclusive design for the layout of new development and for individual buildings will be promoted.”* It is suggested that ‘ensured’ is substituted for ‘promoted’.
- The recognition of the need to understand the local characteristics of the surrounding environment and community on a case by case basis is very compatible with a number of SA objectives.
- Throughout the Policy and written justification – the potential to secure positive benefits as well as conserving/maintaining is commended.
- It is considered that the criteria in section 4 of the Policy could be slightly amended or elaborated as follows:
 - iii Safe and convenient access for all potential users **including by foot, bicycle, and taking into account the needs of the mobility impaired**
 - iv Use of appropriate building materials, **sourced locally where possible**, and techniques respecting local tradition
 - vi Necessary and appropriate street lighting, **avoiding unnecessary light pollution, and** appropriate street furniture and public art
 - vii Energy **and water** conservation features...
- Additional criteria to consider:
 - ix Contributions to enhancing local biodiversity value
 - x Space for information recreation

- It is not immediately clear what is meant by criterion v (Important aspects of detail and quality). Perhaps this could be clarified.
- The written justification could also mention that larger scale development provides opportunities for particularly innovative design and proactive environmental management measures, such as measures to reduce fluctuations in run off including sustainable urban drainage and green roofs, greywater recycling, provision for biodiversity, renewable energy schemes, and provision for walking and cycling.

Policy CS11 Infrastructure Provision

- Securing appropriately phased provision of the full range of infrastructure to support new development progresses several SA objectives.
- The written justification could usefully refer to the provision of green infrastructure, which the TCPA has recently defined as:

“the sub-regional network of protected sites, nature reserves, greenspaces, and greenway linkages. The linkages include river corridors and flood plains, migration routes and features of the landscape, which are of importance as wildlife corridors. Green infrastructure should provide for multi-functional uses i.e., wildlife, recreational and cultural experience, as well as delivering ecological services, such as flood protection and microclimate control. It should also operate at all spatial scales from urban centres through to open countryside”

- It is recognised that infrastructure required through planning conditions or development contributions should only relate directly to the new need resulting from the particular development. However, there may well be instances where the need for green infrastructure functions such as additional flood risk management infrastructure and biodiversity mitigation can be shown to be directly related to the development (particularly for larger scale developments). In these instances, the potential to provide multifunctional green infrastructure should be considered, as well as the potential to pool contributions where appropriate.

Policy CS12 Renewable Energy

- The recognition that renewable energy schemes can not only result in reductions in use of fossil fuels, but also diversification of the economy into growth/environmental sectors is progressive, and to be commended. The Core Strategy also recognises the role that small-scale provision can play.
- The policy provides an enabling approach to the effect that renewable schemes will be acceptable in principle, providing that potential adverse impacts can be sufficiently offset.
- Minor amendments are suggested to the criteria as follows:

- I There is no unacceptable harm to amenity (ie delete residential)
 - II the proposal minimises its visual impact, through appropriate siting, layout, landscaping, design and use of materials, **and remaining visual impacts are acceptable**
 - III measures are taken to minimise increases in ambient noise levels, dust, odour, and traffic generation **to acceptable levels**
- The Council might also wish to consider whether criterion V implies that significant adverse effects are acceptable so long as they are outweighed by social and economic benefits, and if so, to reword the criterion.

Policy CS13 Energy Efficiency

- The written justification and the policy provide a very proactive means by which to ensure that energy efficiency measures, including renewables, are genuinely considered and incorporated, thereby significantly progressing the SA objective relating to energy. Providing such a strong context will send a clear message to developers, who are much better able to incorporate such measures if they are aware from the outset that they will be required.
- There may be a danger that developers take ‘at least 10%’ to mean that 10% is the standard to aim for. Perhaps an additional comment to the effect that the Council will look more favourably upon developments proposing to provide more than 10% of the development’s energy requirement from on-site renewables could be included.
- The intention of the following sentence in the written justification could also be clarified:

Energy efficiency measures will only proceed if it is shown that contributions to reducing greenhouse effects and sustainable development principles will outweigh harm arising from the development