



**South Hams  
District Council**

**SUSTAINABILITY APPRAISAL/  
STRATEGIC ENVIRONMENTAL ASSESSMENT  
of SOUTH HAMS  
DEVELOPMENT PLAN DOCUMENT:  
DEVELOPMENT POLICIES  
PUBLICATION (PRE-SUBMISSION) STAGE**

**SUSTAINABILITY APPRAISAL REPORT**  
April 2009

prepared by

*enfusion*



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STRATEGIC ENVIRONMENTAL ASSESSMENT  
of  
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**SUSTAINABILITY APPRAISAL REPORT**

*for & on behalf of Enfusion Ltd*

*date:* April 2009

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**SOUTH HAMS DISTRICT COUNCIL****DEVELOPMENT PLAN DOCUMENT (DPD):  
DEVELOPMENT POLICIES PUBLICATION (PRE-SUBMISSION) STAGE****SUSTAINABILITY APPRAISAL (SA) REPORT****CONTENTS**

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## 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 Development Policies Development Plan Document (DPD) (Pre-Submission publication Stage) 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.

#### *Method for Appraising the Sustainability of DPDs & Consultation*

- 1.3 A Sustainability Appraisal Framework was compiled 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.

#### *Appraising the Development Policies*

- 1.4 The Core Strategy is the overarching document that sets out the Vision, Objectives and strategic direction for spatial planning in the South Hams area (apart from the Dartmoor National Park). The Development Policies (DP) are an integral part of the planning framework for South Hams and they provide more detailed advice for use in determining planning applications.

- 1.5 Each of the development policies was appraised 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. A number of suggestions were made for improving the sustainability of the Development Policies and changes were made where appropriate.

#### *SA Findings*

- 1.6 Generally the DP policies (called Development Control Core Policies at the Preferred Options stage) were found to positively contribute towards the SA Objectives for Sustainable Development in South Hams. A small number of recommendations were made as a result of the SA which could improve the sustainability of the policies; these are related to sustainable construction, use of previously developed land, housing density, energy use and climate change. Changes were incorporated into the Preferred Options document.
- 1.7 The SA also considered a comparison of the preferred option policies against taking a more or less restrictive approach. It was assessed that the Council has achieved a balanced suite of development policies that take the various aspects of sustainable development (social, economic and environmental) into account and that the preferred policy options are the most sustainable options.

#### *Next Steps*

- 1.8 This SA incorporating SEA Report is now presented for consultation together with the DP Pre-Submission Publication Stage DPD. Comments received will be reviewed; the DPD and the SA Report will be revised to take account of any significant changes that arise as a result of the consultation. Significant changes to the Preferred Options DPD have been further appraised 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 Development Policies will build on, and guide the implementation of, the adopted Core Strategy. 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 Council has taken the full range of issues incorporated in achieving sustainable development into account and that the options of more or less restrictive policy approaches (as set out in the Preferred Options document) will not perform as well as the preferred policies.
- 1.0 A small number of recommendations were made as a result of the ongoing SA which could improve the sustainability of the policies; these are related to sustainable construction, land use, energy use and climate change. Changes were incorporated into the Preferred Options and the pre-Submission Stage DPD that this SA Report accompanies. A factor arising from the SA about renewable energy and landscape character will be better addressed when

the council reviews the Core Strategy. A small number of other minor issues have been noted for consideration at the pre-submission stage and have been incorporated in the final revised policies. This illustrates how Sustainability Appraisal is an ongoing and iterative process and confirms the inter-relationship between the DPDs that comprise the LDF.

### **HOW TO COMMENT ON THIS SA REPORT**

If you have any comments on the SA/SEA of the Development Policies DPD we would be grateful to receive them. Your views are important and the Council needs to receive them by **4pm on 3 July 2009**.

The Council is encouraging those who wish to make representations to do so electronically through the consultation portal at <http://consult.southhams.gov.uk/portal>

Alternatively, comments may be sent to the Forward Planning Team by post, fax or email.

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

**Fax:** Forward Planning at 01803 861404.

**Email:** [forward.planning@southhams.gov.uk](mailto: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 Assessment<sup>12</sup> (SEA) and Government advises<sup>3</sup> 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 Development Policies Development Planning Document (DPD). 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 Development Policies DPD document in accordance with SEA Regulations and SA Guidance.

### Development Policies: DPD Contents & Objectives

- 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 Development Policies build upon the strategic content of the Core Strategy, providing more detailed advice through a suite of policies for use in determining planning applications for the District. The Pre submission Publication DPD has been changed considerably in the content and ordering of the policies as work on the document has evolved. The relationship between the revised policy numbering and the SA numbering are explained in Section 6 below. The final revised policies, as at April 2009, are as follows:
- DP1: High Quality Design
  - DP2: Landscape Character
  - DP3: Residential Amenity
  - DP4: Sustainable Construction

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<sup>1</sup> EU Directive 2001/42/EC

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> ODPM, 2005 *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*

- DP5: Biodiversity and Geological Conservation
- DP6: The Historic Environment
- DP7: Transport, Access and Parking
- DP8: Public Open Space, Sport and Recreation
- DP9: Local Facilities
- DP10: Gypsies and Travellers
- DP11: Housing Mix and Tenure
- DP12: Tourism and Leisure
- DP13: Holiday Caravan, Camping and Chalet Sites
- DP14 Protection of Employment Land
- DP15 Development in the Countryside
- DP16 Conversions and Reuse of Existing Buildings in the Countryside
- DP17 Residential Extensions and Replacement Dwellings in the Countryside
- DP18 Horse Related Uses and Structures

### **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), 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 Development Policies DPD. The relationship with other relevant plans is summarised in Section 4 and Appendix I 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 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.
- 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 DP DPD, since each policy is assessed against each SA Objective.
- The likely sustainability effects of implementing the DP DPD (including environmental effects) is summarised in Section 5 of this report, and detailed in Appendix III. 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 (Appendix III) and summarised in Section 7 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:*

- Justification for the different options considered for the DP DPD is provided alongside the matrix based assessment of options in Section 5 of this Report. 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 DP DPD are provided in Section 8 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. 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 Submission Core Strategy.

#### **Appraising the Core Strategy**

- 3.2 SA incorporating SEA was carried out of the emerging Core Strategy document. Systematic appraisal of the Core Strategy options, objectives and policies was progressed using matrices to record the likely sustainability effects of the option or policy against each objective in the SA Framework. Some recommendations from the SA were progressed within the Preferred Options version of the document (June 2005) and further recommendations progressed within the Submission document (January 2006). The final SA Report documenting the processes was published with the Core Strategy (Submission document) in January 2006.
- 3.3 The development policies build on the adopted Core Strategy, the Vision and Objectives of which have been subject to SA/SEA and reported. To deliver the vision and sustainable development in South Hams 23 strategic objectives have been set for the LDF. These cover housing, economy, transport and accessibility, and the environment and are set out in detail in the Core Strategy. The relationship between the strategic objectives and the development policies is explained in section 4 and Appendix 7 of the DPD.

#### **Appraising Options**

- 3.4 The sustainability appraisal of Spatial Strategy options was carried out in detail during the development of Core Strategy policy approaches and reported in the SA Report (January 2006). In preparing a DPD it is advised that broad strategic options are considered as opposed to detailed policy wording variants. As the DP seeks to provide more detailed advice on Core Strategy policy approaches, the only meaningful alternatives at this stage are consideration of a more restrictive or less restrictive policy approach in comparison to the preferred policy option. The SEA Regulations and SA Guidance require that options and alternatives are given consideration; this SA includes a comparative appraisal detailed separately in Table 3 of this SA Report Appendix III.

## Appraising the Development Policies

- 3.5 Each DP Policy was appraised using the SA Framework of Objectives for sustainability (see also Section 4) and the detailed matrices are reported separately in Table 2 of this SA Report Appendix III. Where there were any potential adverse effects predicted for sustainability or opportunities identified to improve the sustainability of the DP policies, recommendations were made. Changes made to the Development Policies as a result of the SA process are detailed in Section 7 of this SA Report. Further changes to the policies were made after this work was carried out but the District Council felt they were not significant changes and did not require further SA as they are not considered significant changes.

## Summary of SA Method

- 3.6 The method used for this Sustainability Appraisal of the DP DPD comprises the following elements:
- Identifying relevant baseline information and other plans or programmes that influence these Development Policies
  - Comments on each relevant objective of the SA Framework, drawing out and detailing, the areas where each policy has specific potential impacts; highlighting short/long term effects, cumulative effects, with recommendations for proposed mitigation or enhancement where identified
  - Comparison with the options of adopting more restrictive or less restrictive policies
- 3.7 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) (also available separately as Appendices I and II).

## Consultation

- 3.8 The key sustainability issues were identified through the SA scoping process that was subject to 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 SA of the Preferred Options was subject to formal consultation for six weeks in July 2007. 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.
- 3.9 This SA Report is being published for public consultation along with the Development Policies pre-Submission Publication document, in accordance with SEA Regulations and SA Guidance. It will be published on the Council's

website [www.southhams.gov.uk](http://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 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 [www.southhams.gov.uk](http://www.southhams.gov.uk). However, this SA of the DP DPD has identified plans with particular relevance to Development Policies together with a number of other key plans have been published since the initial SA scoping process was carried out, as set out below:

### Local Plans and Programmes Relevant to the DPD

- 4.4 Regional Planning Guidance for the South West (RPG 10) to 2016  
Secretary of State's Proposed Changes to the Regional Spatial Strategy (Submission Stage), July 2008  
Adopted Devon Structure Plan 2001 to 2016 (Devon County Council, October 2004)  
Devon Local Transport Plan 2006 - 2011 (Devon County Council, July 2006)  
Devon Rural Strategy 2007 - Action Plan for 2007 onwards  
Rural Devon Profile 2006 (Devon Strategic Partnership)  
Strategy Document September 2005 A Warm Response - Our Climate Change Challenge (Devon County Council)  
Devon Minerals Local Plan (adopted) June 2004 (Devon County Council)  
Devon Waste Local Plan (adopted) June 2006 (Devon County Council)  
A Sustainable Community Strategy for Devon 2008-2018 (Devon County Council, 2008)

South Devon AONB Management Plan 2004 - 2009  
 South Hams Leisure and Recreation Strategy- Active South Hams 2003-2013  
 (South Hams District Council, 2003)  
 South Hams Prosperity Strategy 2006 – 2011 (South Hams District Council, 2006)  
 Draft South Hams Local Plan Review 2001 to 2011 (South Hams District Council,  
 2002)  
 South Hams Local Cultural Strategy 2003 - 2008 (South Hams District Council)  
 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

### The SA Framework

- 4.5 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. It is important that the Framework for SA reflects local circumstances and those that can be influenced by spatial and development management planning.

**Table 4.1: Sustainability Appraisal Framework**

	<b>SA OBJECTIVE</b>	<b>DECISION-AIDING QUESTIONS</b>
<b>1</b>	<b>Balanced Communities</b> <i>SEA topic: Population</i>	
	Promote community viability and balance	<ul style="list-style-type: none"> <li>▪ Promote mixed use, mixed housing type and mixed tenure developments</li> <li>▪ Encourage regeneration and enhancement of viable communities</li> <li>▪ Enable independent lifestyles for the elderly and those with disabilities</li> <li>▪ Provide sites for community services and facilities (education, health, recreation, social care etc)</li> <li>▪ Provide sites for business and employment within communities</li> <li>▪ Enable people to live near to where they work.</li> <li>▪ Promote social inclusion and community ownership</li> </ul>
<b>2</b>	<b>Access</b> <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"> <li>▪ Enhance access, particularly in rural areas</li> <li>▪ Promote accessible jobs, services and facilities such as shops, schools, banks, health centres, community centres,</li> </ul>

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

		<ul style="list-style-type: none"> <li>▪ Promote a year-round working countryside</li> <li>▪ Support provision of employment to allow young people to remain within their communities</li> <li>▪ Support indigenous growth of small and micro businesses</li> </ul>
<b>7</b>	<b>Economic Growth</b> <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"> <li>▪ Taking advantage of Objective II and Regional assistance from SWRDA</li> <li>▪ Encourage growth of indigenous companies</li> <li>▪ Encourage diversification into key growth sectors, including the environmental sector</li> <li>▪ Provide for the needs of businesses (range of premises, services, infrastructure, skilled workforce)</li> <li>▪ Enhance the vitality of town, district and local centres and encourage their commercial renewal</li> <li>▪ Provide for the purchase of goods and use of services locally</li> </ul>
<b>8</b>	<b>Landscape</b> <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"> <li>▪ Preserve and where possible enhance diverse landscape character and value</li> <li>▪ Maintain a high quality of undeveloped coastal landscapes</li> <li>▪ Protect and enhance the Areas of Outstanding Natural Beauty (AONB) and Dartmoor National Park</li> <li>▪ Maintain and enhance hedgerow cover and traditional field boundaries</li> </ul>
<b>9</b>	<b>Land and Soil Quality</b> <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"> <li>▪ Promote high density development</li> <li>▪ Actively promote the re-use of previously developed land</li> <li>▪ Remediate contaminated land</li> <li>▪ Protect the best and most versatile agricultural land</li> </ul>
<b>10</b>	<b>Biodiversity</b> <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"> <li>▪ Promote ecologically based land management</li> <li>▪ Protect and enhance valuable wildlife habitats and species, both those statutorily designated and those of local</li> </ul>

		<p>value</p> <ul style="list-style-type: none"> <li>▪ Avoid habitat fragmentation</li> <li>▪ Protect and enhance those species and habitats identified in the Devon BAP and the National BAP</li> <li>▪ Protect and enhance the biodiversity value of the Coastline, including estuaries</li> </ul>
<b>11</b>	<b>Historic Environment and Cultural Heritage</b>	
	<i>SEA topic: Cultural Heritage</i>	
	Protect and enhance cultural resources	<ul style="list-style-type: none"> <li>▪ Protect and enhance valued architecture, both buildings (including listed buildings) and their settings</li> <li>▪ Support locally-based cultural resources and activities</li> <li>▪ Protect and improve historical and archaeological environment (landscapes, site, buildings and settings), including Scheduled Ancient Monuments (SAMs)</li> <li>▪ Protect the important geology of South Hams district</li> <li>▪ Protect and enhance Conservation Areas</li> </ul>
<b>12</b>	<b>Minerals</b>	
	<i>SEA topic: Material Assets</i>	
	Encourage efficient exploitation of mineral resources	<ul style="list-style-type: none"> <li>▪ Contribute to the supply of minerals while protecting local communities and the environment</li> <li>▪ Minimise demand for primary minerals and aggregates</li> <li>▪ Recycle local stone, where possible, to reinforce local character</li> </ul>
<b>13</b>	<b>Energy</b>	
	<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"> <li>▪ 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)</li> <li>▪ Support the generation and use of renewable energy, while protecting local communities and the environment</li> <li>▪ Promote energy efficiency by locating development in such a way as to minimise the number of trips made by private car</li> <li>▪ Promote energy efficiency in the design</li> </ul>

		of new development
<b>14</b>	<b>Air Quality</b> <i>SEA topic: Air, Climatic Factors and Human Health</i>	
	Protect and improve local and global air quality	<ul style="list-style-type: none"> <li>▪ Maintain or improve local air quality</li> <li>▪ Reduce the number of trips made by private car</li> <li>▪ Reduce CO<sub>2</sub> emissions</li> <li>▪ Consider the longer term effects</li> </ul>
<b>15</b>	<b>Waste</b> <i>SEA topic: Water, Soil, Human Health and Population</i>	
	Encourage minimisation, reuse and recycling of waste	<ul style="list-style-type: none"> <li>▪ Encourage provision for local community recycling and waste management facilities, including on new developments</li> <li>▪ Promote minimisation, reuse and recycling of construction materials and waste</li> </ul>
<b>16</b>	<b>Water</b> <i>SEA topic: Water and Climatic Factors</i>	
	Protect and enhance the water environment	<ul style="list-style-type: none"> <li>▪ Take into account the predicted effects of climate change</li> <li>▪ Protect and improve freshwater, estuarine and coastal water quality</li> <li>▪ Consider the close relationship between water quality, quantity and flood risk management</li> <li>▪ Increase efficient use and reuse of water resources</li> <li>▪ Promote sustainable coastal and flood risk management that provides for climate change, where appropriate, in new developments</li> <li>▪ Promote Sustainable Drainage Systems</li> </ul>

Symbols used in this matrix are to be interpreted as follows:

<b>++</b>	Likely to contribute considerably to the achievement of the sustainability objective
<b>+</b>	Likely to contribute somewhat to the achievement of the sustainability objective
<b>-</b>	Likely to conflict somewhat with the achievement of the sustainability objective
<b>--</b>	Likely to conflict considerably with the achievement of the sustainability objective
<b>•</b>	Negligible effect on the achievement of the sustainability objective
<b>0</b>	No identifiable relationship with the sustainability objective
<b>?</b>	Level of effect on the achievement of the sustainability objective unclear

## 5.0 SUSTAINABILITY APPRAISAL OF OPTIONS FOR DEVELOPMENT POLICIES

- 5.1 The sustainability appraisal of Spatial Strategy options was carried out in detail during the development of Core Strategy policy approaches and reported in the SA Report (January 2006). In preparing a DPD it is advised that broad strategic options are considered as opposed to detailed policy wording variants. As the DP seeks to provide more detailed advice on Core Strategy policy approaches, the only meaningful alternatives at this stage are consideration of a more restrictive or less restrictive policy approach in comparison to the preferred policy option (these were set out in the Preferred Options version of the DPD). The SEA Regulations and SA Guidance require that options and alternatives are given consideration; this SA includes a comparative appraisal detailed separately in Table 3 of this SA Report Appendix III.
- 5.2 Table 3 provides a detailed comparison of the preferred DC core policies against the other two options: more, or less, restrictive policies. This approach accords with the SA guidance; it does not consider options with minor changes in wording but concentrates on strategic options.
- 5.3 The findings from the SA illustrate that moving the policies in either direction may produce a better performance against some of the SA objectives whilst producing a marked adverse impact on others. In the majority of cases the Council has achieved a satisfactory balance across the range of SA objectives. Clear reasoning is given as to why the preferred approach has been taken and this is supported by the comparative SA.

## 6.0 DETAILED SA OF SUBMISSION STAGE DEVELOPMENT POLICIES

### Summary of SA Findings

- 6.1 Tables 2 and 4 of Appendix III illustrate that there were no serious direct conflicts with the SA objectives or very significant adverse effects and provides a detailed appraisal of each policy, indicating effects over time and direct/indirect impacts where possible. **Please note that these comments relate to the policy numbering of February 2009 rather than the late revision in April 2009. The relationship between the policy numbering is explained below.**
- 6.2 Generally the revised pre-submission stage policies have further improved the overall performance of the DPD against the Sustainability Framework objectives. However the issues of the use of previously developed land (PDL) and dwelling density per hectare are not immediately clear in either the Core Strategy or the Development Policies. Only Policy DP19 now refers to the use of PDL in the context of the countryside. Policy CS5 sets out the requirement for 50% development to take place on PDL. However there no longer appears to be a specific policy which clearly requires the use of PDL in preference to greenfield sites for non strategic development.
- 6.3 Similarly the only reference to housing density is to be found in the Core Strategy under Policy CS3. Requiring appropriate densities has major benefits for the sustainability objectives such as maximising the use of land with good public transport, cycling and walking links, avoiding adverse impact on the countryside and landscape and reduction of carbon emissions. Whilst it is appreciated that policies should not repeat higher level guidance or policies, it is recommended that some reference to the priority use of PDL and the required minimum densities would improve the DPD's performance against these major issues. This could be achieved by signposting these two significant policies in the DPD in the "related planning policy" sections of appropriate policies such as DP1, DP24.
- 6.4 An additional issue arises from the new horse related development policy (DP23). The keeping of horses can lead to contamination of water courses and groundwater catchment areas through seepage from muck heaps. The concern is the potential cumulative impact and in the absence of an overarching policy protecting the water environment this minor change could improve the policy.
- 6.4 However, the development policies are clearly based on national guidance, conform to the over riding Government objective of achieving sustainable development, and provide more detail on the policy themes in the Core Strategy. Although there could be some minor sustainability conflicts, such as the provision of telecom masts and renewable energy development contrasted with the need to protect the built and natural heritage and landscape, the Council has generally achieved a suite of polices that recognise the full scope of sustainable development (SD) and well integrates the social, economic and environmental elements of SD. A number of minor

suggestions were made from the SA for improving the sustainability of the Development Policies and these are detailed above and below.

- 6.4 Along with other areas in the South West, South Hams needs more housing (particularly affordable housing), and needs to strengthen the local economy which is generally a low wage economy and dependant on the tourism sector. Overall, the Development Policies provide a clear framework in which development can take place whilst protecting the natural assets which are so important to the District.

**Review of the Sustainability Appraisal Revised Policy Pre Submission Stage Publication**

- 6.5 As detailed above, the Preferred Options Development Control Core Policies were assessed by Enfusion Ltd in late Spring 2007 and the subsequent report and detailed assessments were published by South Hams District Council in June of that year. However after that assessment, and prior to publication, the policy numbering of the DPD and some of the policy content was altered from the document on which the SA was based. Since then further changes have been made to both the content and the numbering of the development policies. The table below sets out the current policy numbering, the preferred options policy numbering and the policy numbering on which the SA was based. This should aid transparency and clarity for those following the evolution of the policies through the LDF and SA processes. The impact on the SA of changes to policies has been evaluated and detailed SA carried out on the newly introduced policies. The detailed matrices can be found in table 4 of Appendix III. Comments relating to the deletion of policies are given in Table 6.3 below.

- 6.5 April 2009 – Further changes and update.  
This report was written in February 2009. Since that date South Hams District Council have made further changes to the Development Policies DPD which include a further renumbering of the some of the policies and the deletion and alteration of several policies. This paragraph has been incorporated in April 2009 to update the Sustainability Report in the light of these changes and to enable the public to relate this report and the appendices to the accompanying Sustainability Appraisal matrices in Appendix III. Table 6.3 below further updates the changes from Table 6.1. The District Council have not deemed it necessary for these further changes to be subject to further SA as they are not considered significant changes.

**TABLE 6.1 : Evaluation of the alterations to policies from the Preferred Options stage policies and Sustainability Appraisal policies June 2007**

Pre - Submission DPD (Feb 2009)	Preferred Options DPD 2007	SA 2007
<b>Policy DP1 High Quality Design</b>	<b>Policy DC3</b>	<b>Policy DC3</b>
Changes and Comments		
This policy has changed considerably from that originally subject to SA which had references to tenure blind development in relation to affordable housing, sustainable construction and density. These topics are now covered in the Affordable Housing DPD, Policy DP3 and the Core Strategy. There is no longer a reference to housing density in the		

Pre - Submission DPD (Feb 2009)	Preferred Options DPD 2007	SA 2007
---------------------------------	----------------------------	---------

DPD which can now be found in Core Policy CS2 Housing Provision. It is recommended that some reference to the required minimum densities would improve the DPD's performance in relation to land and soil and landscape objectives. This could be achieved by signposting the policy in the DPD in the "related planning policy" sections of appropriate policies such as DPI.

**NEW Policy DP2 Residential Amenity**

This is a very specific policy to protect residential amenity in all its forms. As such it has little or no impact on most of the objectives but does have indirect benefits for employment and the local economy and health. For detailed assessment see Appendix III.

<b>Policy DP3 Sustainable Construction</b>	<b>Policy DC4</b>	<b>Policy DC21</b>
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Changes and Comments

The policy has now incorporated introduction of requirement for 25% Lifetime Homes on developments of 10 or more which improves the sustainability performance.

<b>Policy DP4 Renewable Energy Schemes</b>	<b>Policy DC5</b>	<b>Policy DC22</b>
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Changes and Comments

The policy now clarifies that it is applicable to micro and macro generation as recommended in the 2007 SA and which has improved the performance of the policy.

<b>Policy DP5 Environmental Protection and Management</b>	<b>Policy DC23</b>	<b>Policy DC20</b>
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Changes and Comments

Improved through the introduction of contaminated land issues.

<b>Policy DP6 Biodiversity and Geological Conservation</b>	<b>Policy DC22</b>	<b>Policy DC19</b>
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Changes and Comments

No significant change to policy.

<b>Policy DP7 The Historic Environment</b>	<b>Policy DC24</b>	<b>Policy DC23</b>
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Changes and Comments

No significant change to policy.

<b>Policy DP8 Archaeological Sites and Scheduled Monuments</b>	<b>Policy DC25</b>	<b>Policy DC24</b>
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Changes and Comments

No significant change to policy.

<b>Policy DP9 Transport, Access and Parking</b>	<b>Policy DC16 /DC17</b>	<b>Policy DC13/14</b>
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Changes and Comments

The former two separate policies have been combined and improved as there is now no repetition between the two policies and the sustainability performance of the policy has been improved by referring to the needs of those with restricted mobility.

<b>Policy DP10 Public Open Space, Sport and Recreation</b>	<b>Part of Policy DC12 (Community Facilities)</b>	<b>Policy DC12</b>
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Changes and Comments

The SA noted that the original policy was complicated and actually covered several different issues and assessed them separately. Whilst the content of the policy, and

Pre - Submission DPD (Feb 2009)	Preferred Options DPD 2007	SA 2007
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therefore the SA, has not changed, the separate policies now give greater clarity to users of the document.

**Policy DP11 Local Facilities**

Changes and Comments  
As above

**Policy DC12****Policy DC12****Policy DP12 Gypsies and Travellers**

Changes and Comments  
No significant change.

**Policy DC9****Policy DC6****NEW Policy DP13 Housing Mix and Tenure**

Comments

A very specific policy to ensure that an appropriate mix of dwellings is provided that meet identified local needs. South Hams has a problem with the level of house prices in relation to average earnings and the policy should ensure a supply of more affordable open market units. The demography of South Hams and the high level of older residents will also benefit from a policy which will seek appropriate units to meet their needs. Possible indirect benefits for the economy through enabling younger people to stay in the area due to the availability of appropriate housing. For detailed assessment see Appendix III

**Policy DP14 Tourism and Leisure**

Changes and Comments

**Policy DC12****Policy DC9**

The revised DP policy has changed significantly from Policy DC9, which was the basis for the 2007 appraisal, by the removal of specific references to the loss of tourist facilities in Salcombe and Dartmouth. It also has a slightly different emphasis than Policy DC12 which was subject to the Preferred Options consultation. Whilst Policy DC12 sought that new development a. will not undermine the vitality or viability of nearby town centres; or b. will cause no undue adverse impact on the countryside or local amenity, the revised policy also seeks sustainable and accessible locations, and that in the countryside proposals should also support the objectives of rural regeneration and seek to re-use existing buildings. This has improved the performance of the policy and no adverse impacts are identified.

**Policy DP15 Holiday Caravan, Camping and Chalet Sites**

Changes and Comments

No significant change to the policy except the removal of the criterion related to restoration of sites when use is discontinued. As this should be covered by condition on any planning consent granted there is no impact on the SA.

**Policy DC13****Policy DC10****Policy DP16 Retail Development**

Changes and Comments

The policy has been simplified since the preferred options policy DC 14. However it still follows a less complicated sequential approach and the SA findings remain the same.

**Policy DC14****Policy DC11****Policy DP17 Development in Existing Employment Areas**

Changes and Comments

Although reworded, the implications of the policy are the same apart from a change in the last criteria which requires that mixed use schemes will provide as a minimum the same number of jobs. This improves the performance of the policy as it ensures no loss of local employment opportunities. (However it is confusing that the policy states that all employment land or premises will be retained in their current uses and then sets out

**Policy DC11****Policy DC8**

Pre - Submission DPD (Feb 2009)	Preferred Options DPD 2007	SA 2007
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criteria which will allow change of use).

**Policy DP18 Telecommunications****Policy DC18****Policy DC15**

Changes and Comments

The SA recommended that the precautionary principle was considered for inclusion and this was incorporated in Policy DC18, however it has been removed from Policy DP18 as contrary to advice in PPG 8. No change to the SA.

**Policy DP19 Development in the Countryside****Policy DC2 and DC7/1****Policy DC1 and 2**

Changes and Comments

This policy has changed and does not appear to be an amalgamation of the former policies DC1, 2 and 7 (as in the preferred options) but an amalgamation of Policies DC1 and 2 as assessed in the SA. However, there is no change to the conclusions of the SA regarding those latter policies. It is noted that this is the only reference to previously developed land in the DPD.

**Policy DP20 Conversions and Reuse of Existing Buildings in the Countryside****Policy DC7****Policy DC5**

Changes and Comments

Minor change to the policy removing reference to holiday use. No change to SA.

**NEW Policy DP21 House Extensions and Replacement dwellings in the Countryside**

Changes and Comments

The policy seeks to address the issues of high house prices compared to average earnings by controlling the extension of existing dwellings, or their replacement with larger and therefore more expensive dwellings. This will have a minor but positive impact on housing supply but will have benefits for landscape and access issues. An indirect benefit is that existing energy inefficient buildings can be replaced with dwellings that meet the requirements of level 3 of the Code for Sustainable Homes as required by Policy DP3 and reduce energy and water demands.

**Policy DP22 Agricultural, Forestry and Other Occupational dwellings****Policy DC8****Policy DC2**

Changes and Comments

Policy DC2 (The Countryside) incorporated agricultural and forestry workers dwellings and performed well against the SA objectives. The policy has been further improved by the introduction of other occupational dwellings as advised in PPS7.

**NEW Policy DP23 Horse Related Uses and Structures**

Changes and Comments

The policy performs well in terms of protecting landscape, biodiversity and the historic environment. It also seeks to promote quality in the built environment and the minimisation of impact from the ancillary requirements such as tracks, parking, ménages and the sub division of fields. The only concern is the potential impact on groundwater or water courses from seepage from muck heaps so it is recommended that a reference to this is introduced to the policy.

**Policy DP24 Landscape Character****Policy DC19****Policy DC16**

Changes and Comments

The coastal zone was formerly covered in a separate policy but has now been

Pre - Submission DPD (Feb 2009)	Preferred Options DPD 2007	SA 2007
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incorporated within the landscape character policy. The supporting text includes reference to protected landscapes and the overarching core strategy policy CS9.

**TABLE 6.2: Deleted Policies**

Preferred Options DPD 2007	SA 2007
<b>DC1 Development Boundaries</b> Comment This has now been incorporated in Policy DC2 – no significant impact on the SA.	<b>DC1</b>
<b>DC6 Previously Developed Land</b> Comment Only Policy DP19 now refers to previously developed land (PDL) but Policy CS5 sets out the requirement for 50% of development to take place on PDL. Although the Core Strategy clearly sets out the Council's position on PDL and it is recognised that strategic sites will comprise greenfield land, there no longer appears to be a specific policy which clearly requires the use of PDL in preference to Greenfield sites for non-strategic development. It is recommended that some reference to the use of PDL would improve the DPD's performance in relation to land and soil and landscape objectives. This could be achieved by signposting the policy in the DPD in the "related planning policy" sections of appropriate policies such as DP1.	<b>DC4</b>
<b>DC10 Employment Development in the Countryside</b>	<b>DC 7?</b>
This has to some extent been covered by other policies including Policy CS14 of the Core Strategy.	
<b>DC14 Town Centre Zones</b>	<b>DC11</b>
No significant impact due to revision of Policy DP16.	
<b>DC17 Car Parking</b>	<b>DC14</b>
Incorporated in Policy DP9 – see above	
<b>DC20 Protected Landscapes</b>	<b>DC17</b>
Now incorporated in Policy DP24 as above.	
<b>DC21 Coastal Zone</b>	<b>DC18</b>
Now incorporated in Policy DP24 as above.	

**TABLE 6.3 – Further Policy Numbering Changes April 2009**

Policy reference (April 09)	Policy Reference Previous (Feb 09)
<b>DP1</b>	DP1:High Quality Design
<b>DP2</b>	DP24: Landscape Character
<b>DP3</b>	DP2: Residential Amenity
<b>DP4</b>	DP3: Sustainable Construction
<b>Incorporated into DP4</b>	DP4: Renewable Energy Schemes
<b>Incorporated into DP4</b>	DP5: Environmental Protection and Management
<b>DP5</b>	DP6: Biodiversity and Geological Conservation
<b>DP6</b>	DP7: The Historic Environment
<b>Incorporated in DP6</b>	DP8: Archaeological Sites and Scheduled Monuments
<b>DP7</b>	DP9: Transport, Access and Parking
<b>DP8</b>	DP10: Public Open Space, Sport and Recreation

<b>DP9</b>	DP11: Local Facilities
<b>DP10</b>	DP12: Gypsies and Travellers
<b>DP11</b>	DP13: Housing Mix and Tenure
<b>DP12</b>	DP14: Tourism and Leisure
<b>DP13</b>	DP15: Holiday Caravan, Camping and Chalet Sites
<b>Deleted and other elements covered in DP15</b>	DP16: Retail Development
<b>DP14 Protection of Employment Land Deleted</b>	DP17: Development in existing employment areas
<b>DP15</b>	DP18: Telecommunications
<b>DP16</b>	DP19: Development in the Countryside
	DP20: Conversions and Reuse of Existing Buildings in the Countryside
<b>DP17 Residential Extensions and Replacement Dwellings in the Countryside Incorporated into DP15</b>	DP21: Replacement Dwellings in the Countryside
	DP22: Agricultural, Forestry and other Occupational Dwellings
<b>DP18</b>	DP23: Horse Related Uses and Structures

**Progression of SA Recommendations**

6.7 The recommendations arising from the initial SA were considered by the forward planning team and changes made to the development policies, where appropriate and possible. The changes made as a result of the SA are detailed in the following Table 6.1 with explanations for the progression of the SA findings where relevant:

**TABLE 6.4: Progression of SA Recommendations at the Preferred Options Stage**

<b>Sustainability Appraisal of the Development Control Core Policies Preferred Options – Initial Findings &amp; Changes Made</b>		
<b>Recommendations from the SA carried out by Enfusion</b>	<b>Comments progressed? ✓ Yes X No</b>	<b>Explanation</b>
<p><b>DC1: Development Boundaries</b> The supporting text to the policy explains the methodology behind drawing the development boundaries and the relationship of the policy to the Core Strategy. Several key objectives are fundamental to this strategy such as reducing the use of the private vehicle and thereby being positive in terms of impact on air quality, climate change and energy use. Policy DC1 is a strategic policy and subject specific issues are dealt with in detail</p>	No	N/A

through other complimentary policies. Development boundaries around existing employment sites help the avoidance of sprawl in the open countryside but also give certainty to the business community.  
Recommendation: no change.

**DC2: The Countryside**

The policy aims to protect the countryside from inappropriate development in favour of rural business and community facilities and services. Apart from progressing economic SA objectives, it has long term social and cultural prosperity benefits, allowing local people to remain in their communities.

No changes required

N/A

**DC3: Design and Density**

As a generic policy applicable to all planning applications, it has great importance in progressing all SA objectives. It is recommended this policy could incorporate the suggestions made below.

- Could include requirement to consider scope for green corridors within and between sites as well as promoting recycled construction materials or those from sustainable sources.
- The policy could incorporate a reference to green infrastructure.
- Could cross reference to the requirement for Code for Sustainable Homes level 3 in Policy DC21.
- Could refer to the potential of rain water collection for certain household functions, as well as requirement to consider SUDS.

X  
X  
✓  
✓

- Reference to green infrastructure appears in the adopted Core Strategy policy CS8 'Infrastructure Provision' and in DC19: Biodiversity and Geology the latter also refers to networks of natural habitats.  
- See above comment.  
- Cross reference to Code for Sustainable Homes included in supporting text.  
- reference incorporated into supporting text.

**DC4: Previously Developed Land**

The general principle of maximising the use of previously developed land performs well against the environmental objectives of the SA Framework.

Recommendation: rather than using the generic term "sustainable" in the policy this could be replaced with more specific criteria which will give clarity to the policy especially when read by the general public.

X

Noted. Will be considered for Submission version.

**DC5: Conversions and Reuse of Buildings in the Countryside**

The policy performs well against economic, social and heritage SA objectives. By protecting rural premises from inappropriate residential development this would indirectly, and in the long-term, secure rural business and accessible employment

X

- Re. Scale of development this will be

opportunities with associated prosperity benefits for the rural economy. Although the policy has no direct relationship to many of the environmental SA objectives, and such topics are dealt with by other DC policies, refurbishment and reuse present a good opportunity to increase the sustainability of the site. There could be more emphasis on the need for the scale of development to be appropriate for a rural location. It could also emphasise the role redundant countryside buildings can have in providing habitat for bats and breeding birds as mentioned under Policy DC5. As noted above, the Council could consider SPD on the conversion of traditional rural buildings.

X  
X

considered for Submission version.  
- Reference to protected species appears in para 5.44.  
- The Council currently has an adopted SPG on 'Traditional Farm Buildings in the South Hams: Their Adaptation and Re-use'.

#### **DC6: Gypsies and Travellers**

The policy seeks to ensure adequate provision for Gypsy and Travellers sites, whilst protecting the interests of existing communities and environment and is therefore supported. The policy also supports a traditional, albeit changing way of life which is part of our cultural heritage.

No  
changes  
required

N/A

#### **DC7: Diversification of the Rural Economy**

Positive long-term economic effect. The policy would also indirectly enable people to remain within their community, and assist in keeping town, district and local centres commercially viable through the use of local services and purchase of goods. There could be more emphasis on the need for the scale of development to be appropriate for a rural location. It could also emphasise the role redundant countryside buildings can have in providing habitat for bats and breeding birds, although this would be covered by the suggestion to produce SPD under Policy DC5.

X  
X  
X

-Re. Scale of development this will be considered for Submission version.  
-Issues regarding bats and breeding birds are covered in DC19: Biodiversity and Geology.  
-As before the Council currently has an adopted SPG.

#### **DC8: Development in Existing Employment Uses**

The policy is important in a district such as South Hams with high residential land values. As expressed above this policy performs well against economic and environmental objectives.

No  
changes  
required

N/A

#### **DC9: Tourism & Leisure Development**

The importance of the location of such new development is expressed through the sequential test and is explained in the supporting text to the policy. The policy

No  
changes  
required

N/A

performs well against economic objectives and indirectly has the potential to score well against environmental objectives if the importance of the countryside to the tourism sector is recognised.

Some coastal areas have been subjected to inappropriate development in the past and this policy seeks to maintain the character and integrity of the existing hotel development.

**DC10: Caravan, Camping & Chalet Sites**

✓

-RJ amended to include ref to sustainable tourism in para 6.27.

Natural and built heritage features of cultural or historic importance are South Hams most important tourism asset and any proposal affecting this economic sector must be required to demonstrate (for instance within the design statement) that potential impacts have been carefully assessed.

The policy has both positive and negative effects:

It would indirectly provide for revenue funding (e.g. through planning obligations, investment, and entrance fees) to enable maintenance of landscapes (coastal areas, AONB, Dartmoor National Park as the important geology of South Hams district) and built heritage features. On the other hand the quality of these assets could be eroded/ permanently damaged by inappropriate intrusive development and over use.

Although the policy primarily aims to protect tourism use, the sustainability rating could be improved by reference to sustainable tourism.

**DC11: Town Centre Zones**

No changes required

N/A

Applying a sequential test to new retail development assists in meeting the objective to reduce trips made by the private car and gives opportunities to improve access to town centres by other means. New development brings benefits which could include areas with pedestrian priority and effective park and ride schemes. This will also impact positively on air quality. Protecting the vitality and viability of town centres and encouraging residential use will produce more user friendly town centres which promote social inclusion and development of social networks as the centres become the focal point for civic and cultural activities. This

can increase civic pride and community ownership.

Town centres have the promotional potential to demonstrate good practice in applied innovative environmentally sound design and could act as showcase to raise awareness for the “carbon neutral” concept. As a focal point for any community they could lead by example.

Generally the policy performs well against the sustainability objectives.

**DC12: Community Facilities**

This is a complicated policy which covers issues which are usually divided into two or four separate policies. Therefore where necessary the four elements have been assessed independently above.

Issue 1, the sequential location of community facilities performs well on environmental objectives i.e. reducing the need to travel and protecting landscape value and diversity, but does not perform well against social objectives of social inclusion and access to facilities. There are specific rural needs which are not acknowledged.

X

-Noted. Will be considered for Submission version. Although the nature of the sequential test should help with issues such as access to facilities.

Issue 2, the protection of existing community facilities from conversion to residential use, performs well against environmental objectives and also against social objectives when considered in the rural context.

Issue 3, the requirement for contributions to open space, recreation and sport facilities performs well against social objectives, particularly human health.

**DC13: Transport and Access**

Positive impact on all SA objectives. The policy could require developer contributions to improvements for access by means other than the private vehicle and could refer to the “home-zone” concept. The inclusion of green travel plans is welcomed

X

-Comment noted. Too detailed point to refer to in broad transport policy.

**DC14: Car Parking**

Positive impact on virtually all SA objectives but there is reluctance from house owners and employers to accept demand management of parking. However, strategically the relatively minor issue of

No changes required

N/A

displacement parking is outweighed by the positive environmental benefits.

**DC15: Telecommunications**

Positive in terms of preserving landscape, heritage and amenity and could have positive minor impact for the economy. However could further consider issues of siting telecommunications infrastructure near sensitive land uses (e.g. residential, childcare facilities) due to unknown health risks.

Recommendation: addition of precautionary principle for siting with reference to human health.

X

-Reference will be added to this issue although there is a possibility that this could be contrary to PPG8.

**DC16: Landscape Character**

The policy aims to conserve and enhance the quality, character, diversity and local distinctiveness of the natural and cultural environment and performs well against all objectives. If the nation is to meet its' renewable targets there may be a need for compromise in some landscape character areas. The Council could consider which areas within the District may be suitable for the location of future renewable projects to minimise this conflict.

X

-Noted. Strategic issue that would be best considered through a subsequent review of the Core Strategy.

**DC17: Protected Landscapes**

The policy would have a positive effect on sustainability through preserving and enhancing enjoyment of protected areas. However, there is a potential conflict between protected landscapes and the siting of renewable energy infrastructure (especially wind turbines). The Council could consider which areas within the District may be suitable for the location of future renewable projects to minimise this conflict.

X

-As above

**DC18: The Coastal Zone**

Would result in effective protection for a unique natural asset for South Hams especially, for the tourism/leisure sector and related supply industries. Again there may be a conflict between coastal protection and the siting of renewable energy infrastructure (especially off shore wind turbines). The Council could consider which areas within the District may be suitable for the location of future renewable projects to minimise this conflict. The need to plan for climate change impacts could be

X  
✓

-As above  
-Supporting text amended to include reference to climate change.

considered further in this policy.

**DC19: Biodiversity & Geology**

The policy performs well on the relevant indicators and meets it's specific aim.

No changes required N/A

**DC20: Environmental Protection**

Overall positive impact. Actively protects land/resources/society against pollution contamination. Long-term positive impacts on community, ecology and economy through safeguarding against flooding impacts.

No changes required N/A

**DC21: Sustainable Energy**

The policy performs well against most relevant SA Objective I.

No changes required N/A

**DC22: Renewable Energy**

With reference to off shore and on shore wind turbines the design of commercial renewable energy schemes can be perceived as intrusive, but the long-term benefits far outweigh short-lived visual design concern as the sites can be clearly cleared on cessation of use. The supporting text to this policy refers to micro generation but does not clearly discuss the various types of macro generation which are possible such as biofuel production and associated processing and production of energy through incineration. It would be helpful if both the text and policy clarified that the policy is applicable to micro and macro generation.

The policy generally performs well against environmental objectives but would benefit from greater clarity.

✓

-Supported text has been amended to include reference to both micro and macro generation.

**DC23: Historic Environment**

(Objectives 4, 8, 11 and 12) by encouraging the use of traditional building materials and finishes that are in keeping with local character. Preserving or enhancing historical assets (especially parks and gardens) could also, indirectly, help to conserve biodiversity and progress SA Objective 10.

No changes required N/A

**DC24: Archaeological Sites and Scheduled Monuments**

This policy should progress cultural and heritage SA objectives (Objectives 4, 8 and 11) well (both built and natural) as the site

No changes required N/A

and setting of archaeological remains and scheduled monuments will be preserved.

<b>DP1: High Quality Design</b>	Yes	Revised policy makes cross reference to Sustainable Construction policy.
<b>DP4: Renewable Energy Schemes</b>	Yes	-Supported text has been amended to include reference to both micro and macro generation as in previous Policy DC22

6.8 The changes to the policies after February 2009 are detailed below including where changes have been made as a result of the SA and was provided by South Hams District Council. The recommendations arising from the pre submission stage SA were considered by the forward planning team and changes made to the Development Policies, where appropriate and possible. Enfusion Ltd were not requested to undertake further Sustainability Appraisal of the changes as they were not considered to be significant.

**TABLE 6.5 Changes to policies (April 2009) post the pre-submission stage SA**

Policy reference NOW (April 09)	Policy Reference Previous (Feb 09)	How the policy has changed	SA comments incorporated
DP1	DP1:High Quality Design	Added in reference to CS5 PDL	Density
DP2	DP24: Landscape Character	No change	
DP3	DP2: Residential Amenity	No change	
DP4	DP3: Sustainable Construction	Target for lifetime home standard and requirement for Heat and Power schemes and addition of Renewable energy and environmental protection issues	No suggestions
<b>Deleted</b>	DP4: Renewable Energy Schemes	Main parts put into DP4 and associated text Supporting text clarifies issues for S Hams and need for micro scheme to achieve Level 4 of Code for Sustainable Homes	Includes references to large scale and micro schemes within the text
<b>Deleted</b>	DP5: Environmental Protection and Management	Main parts put into DP4 and associated text Includes wider range of issues such as contaminated land.	Improved through contaminated land
DP5	DP6: Biodiversity	No change	No suggestions

	and Geological Conservation		
DP6	DP7: The Historic Environment	Additional protection of historic or architecturally important buildings	No suggestions
<b>Deleted</b>	DP8: Archaeological Sites and Scheduled Monuments	addition of archaeology Main parts put into DP6 policy and supporting text	No suggestions
DP7	DP9: Transport, Access and Parking	No change	No suggestions
DP8	DP10: Public Open Space, Sport and Recreation	No change	
DP9	DP11: Local Facilities	Clarification to make tests clearer	Made the policy clearer
DP10	DP12: Gypsies and Travellers	No change	No suggestions
DP11	DP13: Housing Mix and Tenure	Reference to tenure	
DP12	DP14: Tourism and Leisure	No real change	No suggestions
DP13	DP15: Holiday Caravan, Camping and Chalet Sites	Clarified that refers to new sites and alterations to existing sites in and out of AONB	Reference to sustainable tourism
<b>Deleted</b>	DP16: Retail Development	There are no Town Centre Zones allocated in this DPD and reference to Small farm shops more appropriate in countryside policy DP 15	No suggestions
DP14 Protection of Employment Land	DP17: Development in existing employment areas	Clarified issue of change of use and protection of employment land. Clearer tests for change of use to protect local economy	Confusing and contradictory policy
<b>Deleted</b>	DP18: Telecommunications	Best to use national policy	
DP15	DP19: Development in the Countryside	Addition of farm shops and agricultural and other occupation dwellings criteria	
DP16	DP20: Conversions and Reuse of Existing Buildings in the	Clarification – limited change	

Policy reference NOW (April 09)	Countryside Policy Reference Previous (Feb 09)	How the policy has changed	SA comments incorporated
DP17 Residential Extensions and Replacement Dwellings in the Countryside <b>Deleted</b>	DP21: Replacement Dwellings in the Countryside	Clarification of the extent of building (not significant)	
	DP22: Agricultural, Forestry and other Occupational Dwellings	Included as part of DP15	
DP18	DP23: Horse Related Uses and Structures	Contamination issues and pedestrian priority amended and added into policy and text	Motorist priority above pedestrian and contamination issue

## 7.0 IMPLEMENTATION AND MONITORING

7.1 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; 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 DP DPD could include the following:

- the number of affordable housing units achieved per annum
- the build rate per annum
- housing land availability
- employment land availability
- the number of houses achieving the Code for Sustainable Homes Level 3 or above
- the number of housing developments achieving 10% energy from renewable sources
- audit of urban and rural community facilities
- the amount of energy generated by renewable energy sources
- the predicted impact of climate change
- town centre vitality
- rural employment rates