



**Strategic Planning and
Infrastructure**

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Please ask for: Jo Perry

Date 17th August 2016

My Ref JP/JLP/IA

Your Ref

Dear Mr Salmon,

Integrated Assessment of the Joint Local Plan including Sustainability Appraisal and Strategic Environmental Assessment. (SA/SEA) – Scoping Report

The Local Planning Authorities of Plymouth, South Hams and West Devon have agreed to work collaboratively on the Plymouth and South West Devon Joint Local Plan for the three Local Planning Authority Areas. This plan will be based around meeting the housing, employment and other development needs of the whole plan area (excluding the Dartmoor National Park) through the preparation of a single strategic document known as the 'Plymouth and South West Devon Joint Local Plan.

The Councils are working together to deliver a joint local plan to ensure that a robust and sustainable development strategy is identified and delivered within the plan area. The Joint Local Plan will allocate specific sites for development and will also specify what infrastructure is required to support housing, employment and other development in the plan area. It will also safeguard areas from inappropriate development and will focus on a range of policies and proposals for different land uses including housing, employment, retail, town centre uses, the natural and historic environment, sport, recreation and transport.

As part of the process of working on the Joint Local Plan the three Councils are looking for opportunities to share both evidence and local plan processes into a single approach. This includes the preparation of a single assessment process which brings together Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) along with Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA) into a single 'Integrated Assessment' or IA.

This 'Scoping Report' brings together work previously undertaken in each Council on SA/SEA. You will be aware that each of the three councils has been progressing SA/SEA process alongside the preparation of their plans and you would have previously commented on scoping reports and other SA/SEA documents prepared as each of the previously separate plans have progressed through various stages of plan making process. This document refers to those



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previous consultation exercises and pulls the process together into a single assessment framework. Any previous comments which you made on previous documents, has been taken into consideration and the previous scoping reports will continue to sit within each of the Councils evidence bases as background information.

I write to you on behalf of the three Councils of Plymouth, West Devon and South Hams to consult you on the content of this document. Comments are invited on this document until the 30th September. Comments are welcomed on any aspect of the document but particularly we would like to ensure that the work progressed by the three Councils has:

- 1) Identified all the relevant policies, plans and programmes
- 2) Identified all sources of baseline data
- 3) Identified all the significant sustainability issues relevant to the plan area?
- 4) Set out appropriate objectives and decision aiding questions within the Integrated Assessment Framework

Please feel free to contact me if you have any questions regarding this document. I look forward to hearing from you.

Kind regards

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Ms Jo Perry
Plymouth City Council
Development Control and Planning
Policy
Ballard House West Hoe Road
PLYMOUTH
PL1 3BJ

Our ref: DC/2016/118267/SE-
01/SP1-L01
Your ref:
Date: 11 October 2016

Dear Ms Perry

**Plymouth and South West Devon Local Plan
Integrated Assessment Scoping Report, including Strategic Environmental
Assessment (SEA) and Sustainability Appraisal (SA)**

Thank you for consultation in respect of the above scoping report. We apologise for the delay in responding to you. Our answers to the consultation questions are set out below.

Scoping report: Plans, Policies and Programmes

For the most part the scoping report has identified the relevant plans, policies and programmes that affect the Joint Local Plan (JLP). However, please note that the list should also include the South West River Basin Management Plan and the Plymouth City Council Local Flood Risk Management Strategy.

The list of plans, policies and programmes refers to Environment Agency Medium Term Plans. With regard to flooding and coastal erosion it should be noted that this is referred to as the Flood and Coastal Erosion Risk Management Investment Programme 2015-16. Furthermore, the Technical Guide to the National Planning Policy Framework has been listed but this has since been superseded by the National Planning Policy Guidance.

Scoping report: Baseline data

We are broadly satisfied that the scoping report has identified the range of baseline environmental issues identified across the JLP area in so far as they relate to our remit (i.e. flood and erosion risks, water quality and resources, aquatic habitats and species, and waste).

The only minor changes we would suggest would be to:

- add a reference to priority habitats within Plymouth (e.g. mudflats and saltmarsh), under 'biodiversity and green infrastructure';
- add a reference to Combined Sewer Overflows as a major risk to the status of the Hoe bathing waters, under 'water'; and,
- replace 'declared' with 'notified' in respect of Critical Drainage Areas (CDAs) and note that Plymouth also has CDAs parts of which extend into South Hams, under 'water'.

Scoping report: Key issues (Sustainability challenges and indicators)

The scoping report has successfully identified many of the key sustainability challenges and indicators for the JLP. However, we consider that there some further points to add.

Under 'biodiversity and green infrastructure', we welcome the aspiration to share green infrastructure information across boundaries to ensure biodiversity benefits are identified and maximised. We would suggest that in addition to biodiversity benefits this includes reference to other multifunctional benefits of green infrastructure. Furthermore, we recommend that a reference is also made to the opportunities the JLP might offer in respect of taking a catchment based approach.

Under the 'water' sustainability challenges we welcome acknowledgement of the need to take a sequential approach and not increase flood risk elsewhere. However, flood resilience and mitigation is a must (not just something to be encouraged) if development is to satisfy the National Planning Policy Framework requirement for development to be safe over its lifetime. We recommend that ultimately any development which must be located in areas at risk of flooding seek opportunities to reduce flood risks to existing development in order to provide wider sustainability benefits to the community and businesses. This could be as a result of works delivered by a developer themselves or through financial contributions secured through planning obligations. We consider that this should also be reflected in the monitoring/indicators column.

We welcome the commitment that development should not have an impact on water quality, especially in relation to biodiversity, river shell fisheries, nutrient levels (phosphorus and nitrates) and bathing waters. However, it will be important that the sustainability appraisal considers areas where waterbodies monitored under the Water Framework Directive are failing or close to failing with regard to nutrients (either in the main or in part) because of sewage industry discharges. This is to ensure that growth does not contribute to any deterioration in the ecological status of the area's waterbodies.

Furthermore, in light of the acknowledged flooding and water quality risks associated with the current reliance on combined sewers within Plymouth (and in other places within the JLP area) we advise that the need to remove surface water drainage from combined sewers as well as the creation of new surface water only drainage schemes is included as a sustainability challenge. This is especially important in areas like the City Centre where the JLP is proposing to significantly increase the residential population. This will inevitably increase foul flows to the sewer further necessitating the need to remove surface water drainage in order to create sufficient capacity and reduce risks to bathing waters and from sewer flooding. We recommend that this should also be reflected in the monitoring/indicators column.

It is not clear how 'Critical Drainage Areas' will be used for monitoring or as an indicator.

Scoping report: Objectives

We are satisfied that the scoping report has identified the appropriate key aims and objectives across the JLP area.

Integrated Assessment Framework criteria

We are satisfied that the Integrated Assessment Framework criteria identified the appropriate key aims and objectives across the JLP area.

SEA Directive requirements

We consider that, in so far as it relates to our remit and provided our recommendations can be accommodated, the scope of the integrated assessment will be sufficient to satisfy the requirements of the Strategic Environmental Assessment Directive.

Yours sincerely

MARCUS SALMON
Sustainable Places Planning Specialist

Direct dial 02084746289

Direct e-mail marcus.salmon@environment-agency.gov.uk



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Please ask for: Jo Perry

Date 17th August 2016

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Your Ref

Dear Mr Simmonds,

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previous consultation exercises and pulls the process together into a single assessment framework. Any previous comments which you made on previous documents, has been taken into consideration and the previous scoping reports will continue to sit within each of the Councils evidence bases as background information.

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Please feel free to contact me if you have any questions regarding this document. I look forward to hearing from you.

Kind regards

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Historic England

Mr Jo Perry
Planning Officer
Strategic Planning and Infrastructure
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West Hoe
Plymouth
PL1 3BJ

Our ref:
Your ref:

Telephone 0117 975 0692
Fax 0117 975 0683

29 September 2016

Dear Jo

re: Integrated Assessment scoping Document for the Plymouth and West Devon Local Plan

Thank you for the opportunity to comment on this important stage in the preparation of the Plymouth and West Devon Local Plan.

Environmental assessment can play a vital part in achieving sustainable development. I think you may have seen our guidance which, if not, can found through this link: <https://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>.

We note that as part of the Joint Local Plan the three Councils are looking to share evidence and local plan processes into a single approach includes the preparation of a single assessment process which brings together Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and other assessments, including health and Equalities Impact Assessment into a single 'Integrated Assessment' and we welcome this approach.

Within the proposed framework at 8.1, we welcome the recognition of the Historic Environment, in Cultural Heritage, as an SEA Topic, along with the Objective



Historic England, 29 Queen Square, Bristol BS1 4ND
Telephone 0117 975 1308 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



The selection of indicators for the historic environment may vary at different stages of the assessment process and in relation to the particular development plan. The priority is to devise indicators which will clearly demonstrate the impact(s) of the plan on the historic environment. All proposed indicators for monitoring the significant effects of a plan should be set out in the Environmental / Sustainability Appraisal Report and finalised in the adopted plan. It could be, for example, that one such issue to consider is **”Does it harm the significance of a historic asset?”**. Paragraph 132 of the NPPF outlines the weight that should be attached to such harm and the following paragraphs’ indicate the choices available to the local authority in its decision making.

While we accept that some areas of this work might be too detailed for an SA/SEA it is important that work, it is important **not** to use the Sustainability Appraisal as a substitute for an appropriate heritage impact assessment for some areas of planning work. The SA is frequently far too general in approach and not undertaken by someone with the relevant expertise to consider *significance* or *setting*. The approach advocated in the [Historic Environment and Site Allocations in Local Plans, Historic England Advice note 3](#), should be undertaken by an appropriate professionally skilled historic environment specialist.

There is an expectation that local authorities demonstrates there has been a proper assessment of the significance of heritage assets affected, including their settings¹. This would set out what it is about specific heritage assets affected that is important and how the land/site proposed for development contributes to that significance, and what in turn this means for the principle of development, and any future design response. Without such an assessment the local authority cannot properly assert that the objectives for sustainable development have been understood and therefore cannot say whether the objectively assessed development needs of the area will be met or not in accordance with the presumption in favour of sustainable development.

A robust consideration of the positive and negative impact on the historic environment, heritage assets and their setting is essential. You will have to consider how national policy for sustainable development and legislative obligations relating to the historic environment can be recognised. The methodology needs to acknowledge the following, that the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment and conserve heritage assets in a manner appropriate to their significance².

In terms of local plan, this means identifying sites and policies for development which are compatible with the Local Plans policies for the historic environment and the requirements of the NPPF, the NPPG and primary legislation³ regarding the conservation of heritage assets and the delivery of sustainable development.

If you wish to discuss the above points please do contact me.

¹ NPPF paragraph 132

² NPPF, Paragraph 126

³ Under sections 16, 66 and 72 of the Planning (Listed Building and Conservation Areas) Act (1990), considerable importance and weight is to be given to the desirability of preserving listed buildings and conservation areas.



Yours sincerely



Ross Simmonds
Principal Historic Environment Planner



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Date: 20 September 2016
Our ref: 193926
Your ref: Plymouth & South West Devon Joint Local Plan



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BY EMAIL ONLY

Dear Jo

Planning consultation: Plymouth & South West Devon Joint Local Plan: Integrated Assessment (incl SA&SEA) Scoping Report

Thank you for your consultation on the above dated 18 August 2016 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

General

We recognise that a lot of work has already been done in developing Sustainability Appraisals/Strategic Environmental Assessments to underpin separate Local Plans for each of the 3 local authority areas and that part of the task in preparing a joint plan is to draw together and build on work already undertaken. Below are set out some comments some on specific sections as well a general point about ensuring that there is a clear link between sustainability objectives developed for this Joint Plan and issues identified in previous scoping reports.

Section 3: Consultation. Towards the end of the third paragraph it states that “there will be no new substantial scoping documentation” and that the three Local planning Authorities will rely on the various scoping documents already prepared. Whilst the existing scoping reports will contain a substantial amount of information relevant to development of the Joint Plan it is important that the baseline data and associated scoping issues are updated to reflect current conditions. In addition it is important that the baseline data and issues identified in this summary report are clearly cross referenced with relevant baseline information & issues set out in previous reports and that the previous SA/SEA scoping reports are appended so that the scoping report for this new Joint Plan can be read as a standalone document.

Section 6: the Scoping Report (general)

In a number of instances there is reference to ‘Duty to Co-operate documents’ within the column titled ‘PPPSIs’ (which presumably refers to relevant Plans, Policies and Programmes). We question whether it is helpful to define documents as ‘duty to co-operate documents’ as there is no guidance about what type of documents are likely to be included. It might be clearer to refer to these documents as locally relevant policy documents.

The baseline data should identify indicators which will provide an affective framework for monitoring

plan performance and the impact of specific plan policies. For some topics specific baseline information is referred to whilst in others the information set out is fairly general. It may be that more detailed information is provided in scoping reports previously prepared, in which case the relevant sections should be cross referenced and appended/transferred to the current document. The scoping report should also state where desirable/necessary baseline information is currently unavailable.

It is assumed that the column titled 'Sustainability Challenges' summarises the issues arising from a consideration of existing plans and programmes and the baseline data. It would be helpful if the column heading could state how the sustainability challenges have been derived.

Section 6: Biodiversity and Green Infrastructure

Under the column titled 'key policies Plans & Programmes' the green infrastructure frameworks being developed by West Devon Borough Council and South Hams District Council do not appear to be mentioned.

The aims & objectives listed in the second column appear only to reflect international and national plans and policies rather than those that are locally focused. It may be that such detail is set out in the separate scoping reports prepared by each Local Planning Authority (LPA). If that is the case the relevant section in previous reports should be cross referenced and summarised here.

Entries in the 'Baseline data' column need to be checked for consistency. For instance Special Areas of Conservation (SACs) relevant to the Plymouth area are specifically named but not those within or adjoining South Hams or West Devon. In addition the general information provided in this column should be cross referenced with any more detailed baseline data provided in previous scoping reports (e.g. details and information on the condition of key designated sites) and summarised here.

The column titled 'sustainability challenges' is very slim and doesn't appear to provide the link to the sustainability objectives set out in section 8. If additional issues are referred to in previous scoping reports it is suggested that they be summarised here and cross referenced with the previous reports.

Section 6: Landscape

In this section we would expect to see issues of tranquillity (particularly in respect of the AONB areas), and light pollution referred to, in addition to potential landscape impacts.

Section 8: Integrated Assessment Framework

Objective 9: biodiversity, fauna and flora. In the first bullet it suggest that "or" be replaced with "and". In the second bullet it is suggested that "Enhance and" be inserted before "improve connectivity of green infrastructure...." as improving green infrastructure is important alongside connecting what exists already.

In addition the objectives should identify the need to address recreational impacts which have been highlighted in section 6 as a key issue/challenge.

Objective 10: Landscape. A definition of the meaning of "natural networks" referred to in the 4th bullet point would be useful.

Objective 14: soil and water. Should the assessment criteria not include the need to protect soils of high environmental quality (as referred to under 'Sustainability Challenges on page 44). In addition it is suggested that the issue of appropriate soil management and storage be considered.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Carol Reeder on 0208 225 6245 / 07721 108902 or carol.reeder@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Carol Reeder
Lead Adviser
Sustainable Development Team – Devon, Cornwall & Isles of Scilly