

Appendix VII: SA Scoping & HRA Screening Consultation Representations

Consultation Representations to SA Scoping Report & HRA Screening Report (August 2017)

Consultee Section of SA Scoping Report	Consultee Comments	Enfusion Responses & Action Taken
Environment Agency		
PP Review (2.2)	The regional or local lists should also include our relevant Catchment Flood Management Plans/Flood Risk Management Plans and the lead local flood authority's Local Flood Risk Management Strategy.	Agreed
(3.6)	We are pleased to see that the report recognises the importance of Dartmoor's landscape in storing carbon and water (3.6). Equally we welcome the recognition of the multifunctional benefits provided by the moor's rivers in terms of managing water flows, quality and supply as well as their contribution to landscape character, recreation and biodiversity	Noted, with thanks
(3.21-3.38)	Similarly, with regard to Biodiversity, Geodiversity and Green Infrastructure we are pleased to see the recognition of the multifunctional benefits provided by Green Infrastructure. The report has also identified of the priority habitats and species of importance to us.	Noted, with thanks
	We are pleased to see the acknowledgement of Water Framework Directive (WFD) and the positive role that local planning policy can make towards achieving WFD objectives.	Noted, with thanks
(3.64)	The report recognises the potential risk to water-bodies from sewage treatment facilities and the potential information gap that exists. it is important that increases in foul flows from new development does not result in a deterioration in the ecological status of a water-body. Whilst a sewage treatment plant may have capacity, within the terms of its Environmental Permit, to accept new flows, if that permit does not require the operator to strip out nutrients prior to discharge then it could cause a new failure in terms of nutrient levels or simply add to an existing nutrient failure.	Agreed & noted

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(3.120-3.123)	With regard to energy and climate change we consider it would be good if this section acknowledged the function the moor plays as a carbon store as has been recognised in the landscape section. The protection of this carbon store is essential.	Agreed and additional text provided in Section 3
Tables 4.1, 4.2 & 4.3 Issues & SA Framework	Notwithstanding the comments above, we support the key sustainability issues presented in Table 4.1 and the SA objectives and indicators set out in Table 4.2 especially with regard to the themes of biodiversity, water, climate change and waste. We also support the SA Framework set out in Table 4.3.	Noted, with thanks
Initial HRA Screening	We are satisfied that the initial HRA screening report has, like the SA Report, identified the key Priority habitats and species of interest to the Environment Agency on Dartmoor. This includes Atlantic Salmon as well as Otters and Blanket Bog, all of which we are a lead partner for.	Noted, with thanks
Historic England		
SA	It is important that the historic environment is broadly defined and that the baseline considers all designated heritage assets and their settings, together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place and local identity. We therefore welcome the references to designated and non-designated heritage assets.	Noted, with thanks
Issues & Table 4.1	We agree with the key issues identified in Table 4.1 under "Historic Environment", but suggest that the main key issue is how to conserve and enhance the historic environment of the National Park and the heritage assets (significance as well as its setting and both designated and undesignated, including historic landscapes) within, while seeking to meet the objectively assessed development needs of the NP. This will be an important consideration given that the policies of the National Planning Policy Framework for the conservation and enhancement of the historic indicate that development should be restricted (paragraph 14). The key messages cited from the National Planning Policy Framework should include the requirement for Local Plans to contain a " <i>clear strategy for</i>	Noted & agreed, with thanks Issue added to Section 3

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	<p>enhancing the natural, built and historic environment" and to "identify land where development would be inappropriate, for instance because of its environmental or historic significance" (paragraph 157). Correctly identifying this point, along with those already identified, would better help you achieve the SA objective 4, on page 58: <i>To protect, conserve and enhance the historic environment and its setting</i>; an objective we support.</p>	
SA method for site options	<p>We note that this point is picked up later in Table 4.3, in the column decision aiding questions. We welcome this.</p> <p>We also welcome the reference to "setting". We understand that the Red/Amber/Green thresholds are intended to be a simple indication rather than a detailed assessment, but we should make the point that the impact of a development within the setting of a heritage asset on the significance of that asset depends on the particular relationship between the asset and its setting: using, for example, the same arbitrary set distance for each asset is very simplistic.</p>	Noted with thanks & agreed
SA framework decision-aiding questions	<p>The Council should be aware that some archaeological assets may be of national significance equivalent to Scheduled Monuments, even if not designated as such, as recognised by paragraph 139 of the National Planning Policy Framework. We would also like to see a criterion based on Historic Landscape Character in accordance with paragraph 170 of the Framework, with a reference to impact on landscapes and landscape features of historic significance.</p>	Agreed with thanks, & including landscapes added to criterion 2 for Historic Environment Theme in the Strategic Framework and SA Objective No 4. in the Sites Framework
Proposed monitoring	<p>As regards possible indicators/measures, the Historic England advice contains a range of possible indicators.</p>	Noted with thanks. The SA will seek to share the monitoring with the Local Plan (and in line with Government guidance)
Natural England		
	<p>The reports are generally thorough and clear.</p>	Noted, with thanks
HRA	<p>Vulnerabilities for each European site - it is stated whether the threat is from inside or</p>	Noted.

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Appendix 1	outside. This would benefit from some clarification. Is this from within the European site or within the National Park? Under Human intrusions and disturbances (p.2/16) it is stated that this is a threat from inside. Is recreational pressure not mainly a pressure from outside the site and the National Park?	Explanatory footnote added in Appendix I to clarify meaning of Inside & Outside
Page 6/16	Spelling mistake: <i>Erica tetralix</i>	Corrected
SA para 2.2	Under regional plans and programmes, it would be useful to add the GI strategy for the submitted Plymouth, South Hams and West Devon Joint Local Plan, as well as to mention the newly emerging GI strategy for the Greater Exeter Strategic Plan.	Agreed & added Plymouth GI strategy. No version of GI strategy for the Greater Exeter Strategic Plan in public domain, but will be considered when available.
Chapter 3 baseline	The baseline in most cases identifies general trends that <i>could</i> be an issue, not whether something is an issue now. It is acknowledged that data are not always available but the baseline would be more robust if the text would be clearer on what the current state is and whether that poses a problem, and where, in relation to the identified issue.	Agreed & the key current issues are made more explicit.
Devon County Council		
SA	Pleased that the sustainability appraisal framework has been thoroughly prepared and addresses the significant issues identified through the description and analysis of the baseline situation on Dartmoor.	Noted, with thanks
HRA	The HRA screening report is also well prepared and we have no additional comments to make.	Noted, with thanks