

Environmental Report for the 'East Devon AONB Management Strategy Consultation Draft 2008'

Strategic Environmental Assessment (SEA)
and Sustainability Appraisal (SA)

Prepared by



For the East Devon AONB Partnership
July 2008

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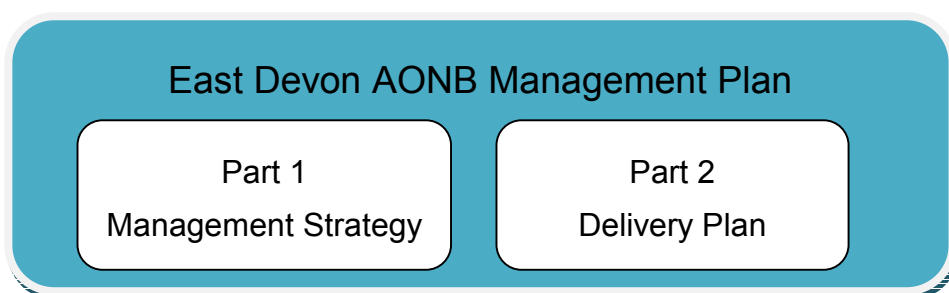
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1 Context

This Environmental Report has been prepared as part of the Strategic Environmental Assessment (SEA) undertaken on the East Devon Area of Outstanding Natural Beauty Management Strategy 2008. This report also covers the optional Sustainability Appraisal.

1.1 AONB Management Plan Review

The East Devon Area of Outstanding Natural Beauty (AONB) Management Plan is divided into 2 parts, a Strategy and a Delivery Plan, and taken together these form the 'AONB Management Plan'.



The Countryside and Rights of Way Act 2000¹, which created the statutory duty to prepare and publish a 'Management Plan' for the East Devon AONB, also requires that the Management Plan be reviewed on at least a 5 yearly basis².

The current Management Plan was adopted in 2004 and its five-year Delivery Plan is nearing completion. The East Devon AONB Partnership has undertaken the statutory review of the current Management Plan on behalf of the relevant local authorities. In the years since its adoption, priorities have changed and there are new forces exerting pressure on the AONB. As a result it was felt by the AONB Partnership that the policies within the Management Plan also needed to be reviewed to ensure that these new challenges to the conservation and enhancement of the AONB were addressed at the policy level as well as the delivery level. The 'East Devon AONB Management Strategy Consultation Draft 2008' is the result of this review.

More information on this Review process is contained within the 'Management Strategy Review Report Pre-public consultation July 2008' produced by the AONB Partnership.

¹ The Countryside and Rights of Way Act 2000 c.37. Hereafter referred to as the 'CRoW Act'.

² Section 89

1.2 Strategic Environmental Assessment

The requirement to undertake Strategic Environmental Assessment (SEA) is established by the European Directive 2001/42/EC of the European Parliament and of the Council on the assessment of the effects of certain plans and programmes on the environment³(the 'SEA Directive'⁴.)

The objective of the SEA Directive is to:

'...provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.' (Article 1, SEA Directive).

In simple terms SEA is a proactive process which provides plan-making bodies with a way to integrate environmental considerations and standards of due care, into the early stages of decision-making.

AONB Management Plans require SEA because they are plans which:

- are subject to preparation and/or adoption by an authority at local level; and;
- are required by a legislative provision (that is, CRoW Act section 89(2)).

The SEA Directive is transposed into English law through The Environmental Assessment of Plans and Programmes Regulations 2004⁵, (The 'SEA Regulations') but these do not add any further requirements.

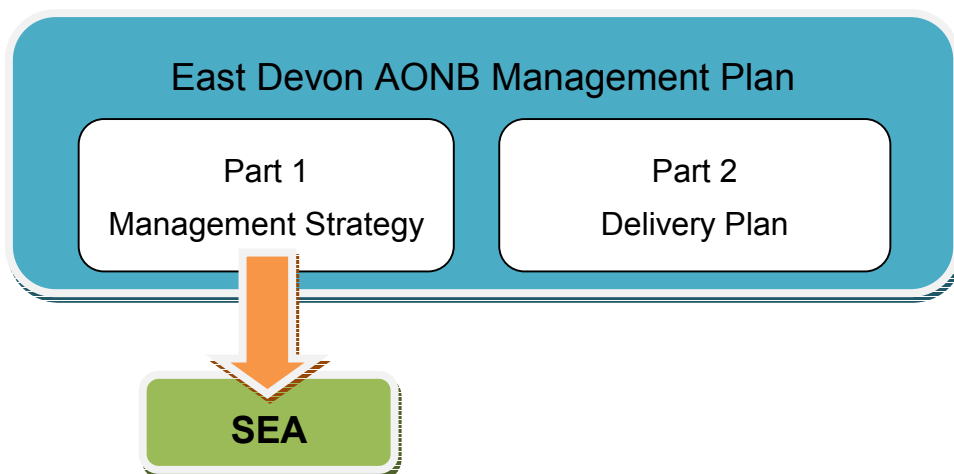
The term 'plan' within the SEA Directive includes revisions, so the Management Plan Review also falls under the scope of the Directive.

³ OJ L 197, 21.7.2001, p.30.

⁴ Although the word 'strategic' does not appear in the Directive, amongst environmental practitioners it is commonly known as the 'Strategic Environmental Assessment' Directive (or SEA Directive) because it deals with environmental assessment at a higher, more strategic, level than that of projects (which are dealt with in the Environmental Impact Assessment (or EIA) Directive (Directive 85/337/EEC as amended by Directive 97/11/EC)). The relevant England Regulations which transpose the Directive refer to it as the 'Environmental Assessment of Plans and Programmes Directive'.

⁵ Statutory Instrument 2004 No.1633

Because the SEA process focuses on **policy** it has been undertaken on the 'Part 1 Management Strategy' containing the policies which set the framework for the management of the East Devon AONB. This Report also presents the findings from an optional Sustainability Appraisal also carried out on the Management Strategy policies.



1.3 Purpose of this Environmental Report

This Environmental Report is presented for consultation alongside the East Devon AONB Management Strategy Consultation Draft 2008 so that responses to the Management Strategy can be informed by the findings of the Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). Both the SEA and SA have been carried out on policies contained within the 'East Devon AONB Management Strategy Consultation Draft 2008' based on information available at the time.

Additional information arising during the consultation relating to either the Management Strategy or to the SEA and SA may call for modification of these assessment findings.

1.3.1 How to comment on this Report

The AONB Partnership welcomes your views and comments on the SEA and SA of the AONB Management Strategy Consultation Draft. Comments should be directed to:

East Devon AONB Partnership
East Devon Business Centre
Heath Park
Honiton
Devon
EX14 1SF

Email: aonb@eastdevon.gov.uk

Your comments should reach the AONB Partnership by **30 September 2008**.

All comments on the Environmental Report, received before the end of the consultation period, will be reviewed and taken into account during the preparation of the final East Devon AONB Management Strategy. An 'Adoption Statement', which will be published alongside the final version, will set out how the SEA findings and the consultation responses have been taken into account in the final East Devon AONB Management Strategy.

1.4 Main Objectives of the East Devon AONB Management Strategy

The AONB Management Plan sets out East Devon District Council and Devon County Council policy (The Management Strategy) and action (The Delivery Plan) in relation to the management of the East Devon AONB. As required by Section 89 of The Countryside and Rights of Way Act 2000.

The main purpose of the East Devon AONB Management Strategy is to formulate local authority policy in relation to the AONB. In addition these policies should be used by other relevant authorities⁶ to assist them in exercising their functions⁷ with due regard to the AONB, a duty imposed by section 85(1) of The Countryside and Rights of Way Act 2000.

'85(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

The Management Strategy has 5 key purposes:

- To highlight the special qualities and issues of the area and the importance of its different features.
- To present an integrated vision for the future of the AONB as a whole in the light of local, regional and national priorities.
- To set out agreed policies and objectives with specific targets, which will help secure that vision.
- To identify what needs to be done, by whom and when, in order to achieve these outcomes in The Delivery Plan.
- To state how the condition of the AONB and the effectiveness of its management will be monitored.

To achieve this, the Management Strategy sets out a series of **Key Objectives** under three Management themes:

Management Theme	Section within Management Strategy
Landscape	4.1
Sustainable Development	4.2
Management	4.3

⁶ Relevant authorities to which this duty applies are defined in section 85(2) of the CRoW Act 2000.

⁷ Under this duty 'functions' also includes 'powers' and other 'duties'

2 Scope of the Strategic Environmental Assessment and Sustainability Appraisal

2.1 Introduction

Natural England has produced Guidance to English AONB Partnerships and Boards on Strategic Environmental Assessment (SEA) of AONB Management Plans, provided by Natural England January 2008. This was used to inform the SEA methodology.

The SEA has been integrated as far as possible, into the Management Plan Review process.

The SEA and SA have been carried out by an independent consultant, Crimson Beetle Ecological Consulting, on behalf of the AONB Partnership (acting as the 'Responsible Authority' under the CRoW Act⁸.)

2.2 Scoping Report

The scoping stage achieved the following:

1. Identified a range of relevant strategies, policies, plans and legislation that could influence or be influenced by, the AONB Management Plan.
2. Identified the processes which will provide the environmental baseline.
3. Identified Primary Environmental Indicators.
4. Identified additional indicators relating to sustainability.
5. Recorded an initial assessment of key environmental issues affecting the AONB (these have been supplemented throughout the Management Plan Review process)
6. Established that the optional Sustainability Appraisal would be undertaken.
7. Identified and agreed sets of:
 - a. environmental objectives
 - b. sustainability objectives
8. Outlined the SEA methodology, including the decision that the need to review each policy would be judged from the outcome of the assessment. This effectively means that alternatives will only be developed where the assessment reveals an adverse effect.
9. Established that a screening exercise under the Conservation (Natural Habitats, &c.) Regulations 1994 would be undertaken, as a separate but complementary process, and that this would be reported on separately.

⁸ The Countryside and Rights of Way Act 2000.

The SEA Regulations require that the 'Consultation Bodies' be given an opportunity to comment on the scope and level of detail of the Assessment and the Environmental Report. The Consultation Bodies are:

- Natural England
- English Heritage
- Environment Agency

Consultation Bodies responded in February 2008, each highlighting documents and plans specific to their areas of expertise that should be included in the SEA. These comments were taken into account in the final Scoping Report. A comprehensive list of all relevant strategies, policies, plans and legislation, and their relationship to the AONB Management Plan is provided in the Management Strategy Consultation Draft, section 2.4.

2.3 Assessment Methodology

This environmental assessment has been structured around analysis of the policies in the Management Strategy Consultation Draft 2008 against the agreed set of environmental objectives (the SEA Objectives), and the set of sustainability objectives (the SA Objectives). This suite of objectives was agreed at the Scoping stage, and is adapted from those recommended in the Natural England guidance on the SEA of AONB Management Plans and conforms to the SEA Directive requirements.

Assessment stages were as follows:

1. Initial appraisal reviewed all policies against the SEA Objectives with a view to identifying obvious and significant adverse effects. This enabled the Management Strategy Consultation Draft to be published expediently and allow the maximum time for public consultation.
2. The policies were formally reviewed against the SEA Objectives. The assessment aimed to identify any significant adverse environmental effects. It also considered ways of improving performance through alternative policy wording. The appraisal was conducted in a strict manner, with a view to identifying where policies could be further strengthened. This process used a series of assessment aiding questions developed from the 'Forces for Change' identified through the SEA scoping and Management Plan Review process.
3. The Strategy's environmental performance in terms of meeting the SEA Objectives (and SA Objectives) was recorded using the six-point scale shown in Table 1.
4. It is important to acknowledge that the assessment examined each of the policies in isolation. That is to say, the assessment did not take into account the wording in the supplementary text or that of the Key Objective under which the policy lies in the Management Strategy. In practice most times the policies are used, reference will be made back to the context of the Management Strategy, but this assessment approach ensures individual policies are strong enough to 'stand alone' when used out of context and still able to conserve and enhance the AONB.
5. The need to revise each policy was judged from the outcome of this assessment. Development of alternatives therefore focussed on the policy level, where policies were identified as having an environmental effect. Following Natural England

guidance, alternatives were only developed and assessed where draft policies were shown to have an adverse effect (either alone, in combination etc.).

Table 1 Six point scale to record environmental performance of policies against assessment Objectives

Strongly supports the objective	S++
Supports the objective	S+
Is neutral in effect	N
Potentially works against the objective	C- (C = conflicts)
Strongly works against the objective	C- -
Effects uncertain (more information is required to ascertain effects, or impact depends on implementation)	X

2.4 Relevant Plans, Programmes and Environmental Objectives

The East Devon AONB Management Strategy is first and foremost a document setting the policy framework for how local authorities exercise their functions in or affecting the AONB. However, it also guides the work of other public bodies and organisations which operate within, or may affect the AONB. As such the Management Strategy cuts across a broad range of sectors and there are many policies and objectives which impact on it.

It is envisaged that the AONB Partnership will continue to review and update the collated relevant legislation, plans, policies and strategies as part of their ongoing work.

An appraisal of related law, plans, policies and programmes was carried out during initial stages of Management Plan Review and a summary is provided in Section 2.4 of the Management Strategy Consultation Draft 2008.

2.5 Environmental Objectives

Developing SEA objectives is not required by law, but it is a recognised method of assessment. The objectives in Table 2 below were adapted from those provided in the Natural England guidance to AONBs. They were prioritised to more closely reflect the purpose of AONB designation.

Table 2 Environmental Objectives

E1	To protect and enhance landscape
E2	To protect and where practical enhance biodiversity (habitats)
E3	To protect and enhance fauna and flora (individual species)
E4	To maintain cultural heritage (including architectural and archaeological heritage)
E5	To protect material assets including natural resources
E6	To protect and enhance soil quality
E7	To protect water, air and climate
E8	To safeguard human health
E9	To ensure no adverse effect arises on population (i.e. demographic balance)
E10	To avoid significant adverse effects between the above interrelationships

Expansion of the Environmental Objectives

It is not immediately obvious where some important issues identified within the AONB Strategy fall within these objectives and so these are clarified below.

Impacts relating to ‘geodiversity’(which includes geology and geomorphology) are assessed under E2. The rationale for this is twofold. Firstly, Biodiversity and Geology are considered together in the Management Strategy. Secondly, they are considered together within a number of other policy documents including the UK Government’s national ‘Planning Policy Statement 9 Biodiversity and geological conservation’.

Impacts relating to ‘tranquillity’ and the ‘dark sky’ resource of the AONB are assessed within objective E5, being viewed as an important ‘natural resource’.

2.6 Sustainability Objectives

In addition to environmental issues, the Management Strategy deals with community and economic issues in the context of how these can impact on the area’s natural beauty. Although not a legal requirement, it is appropriate to apply a second tier of sustainability objectives. Five headline objectives were identified at the Scoping stage.

Table 3 Sustainability Objectives

S1	To create more vibrant, cohesive, safe and mixed communities
S2	To protect the quality and character of individual settlements and communities
S3	To protect the environment, people and properties from flood risk
S4	To promote the development of an economy that supports social and environmental objectives
S5	To minimise the consumption of natural resources including fossil fuels, minerals, land take and water

3 Environmental Baseline

Environmental baseline data relating to the East Devon AONB has been collated by the AONB Partnership as part of the Management Plan Review process and in the interests of expediency is not repeated here. An overview of the area's significance can be found in the East Devon AONB Management Strategy Consultation Draft 2008, in Section 1.1. In addition, relevant summary data is presented under each Management sub-theme.

It is expected that the environmental baseline information will be further developed as part of the statutory Management Plan Review process and during the implementation of the Management Plan.

3.1 Statement of Key Environmental Issues and Forces for Change

The Management Plan Review process identified Forces for Change affecting the environment and important features of the AONB. Issues were identified from:

- East Devon AONB Management Strategy 2004
- The Review process - professional judgement, and AONB Partnership feedback

The issues will be kept under review during the course of the AONB Management Plan consultation.

The most relevant and influential are presented under the Trends and Forces for Change heading within each Management sub-theme within the Management Strategy Consultation Draft 2008. A table listing all the Forces for Change is given in Appendix 1.

3.2 Developing strategic alternatives

Part 3 of The Environmental Assessment of Plans and Programmes Regulations 2004, Section 12(2) states that an Environmental Report should:

'identify, describe and evaluate the likely significant effects on the environment of -

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.'

Common SEA practice uses alternatives including 'Do Nothing', 'Business As Usual', 'Best for Environment' options, and others specifically developed for the plan being assessed. The appropriateness of these to the task at hand is discussed below.

3.2.1 'No Action' or 'Do Nothing' Alternative

Predicted environmental trends in the absence of management plan interventions

The environmental implications of not having an AONB Management Plan were considered in the Scoping Report.

Without the implementation of an AONB Management Plan the environment of the AONB would continue to receive protection under the wide range of statutory regimes such as the Habitats Directive, Water Framework Directive, Town and Country Planning regime etc., which all serve to reduce the likelihood of significant environmental deterioration. The AONB would also continue to be considered in other significant plans, policies, strategies and decisions, because of duties imposed by the Countryside and Rights of Way Act 2000, Section 85.

Whilst in practice there are many organisations that would continue to contribute to the AONB's protection, there is no single organisation or regulatory mechanism with a complete overview or wide reaching influence over everything with potential to impact on the AONB. It is possible that without the implementation of the AONB Management Plan the cumulative effect of small-scale, or uncoordinated changes in direction in the management of the natural and built environment could threaten the area's environmental quality and distinctiveness – factors central to its designation as an Area of Outstanding Natural Beauty.

Without AONB Management Plan interventions to set a framework for the area, it is likely that there would be significant inconsistencies in the conservation and enhancement of the area's natural beauty; its full range of distinctive and special qualities; and key features for the whole of the designated area, as well as many missed opportunities for added value. The AONB Management Plan therefore provides a focus for the actions of others and seeks to bring key agencies and the local community together to work to retain, conserve and enhance the existing high quality landscape of the area, add value to existing processes and enable positive change through sustainable solutions and development.

Preparation of an AONB Management Plan is required by law; therefore it is not a viable option to 'Do nothing'. In the interests of expediency this alternative has not been examined any further than was undertaken within the Scoping Report.

3.2.2 'Business as Usual' Alternative

This assessment would consider the implications of continuing with the policies outlined in the current Management Strategy 2004, assessing them against the SEA Objectives. However, the review process has highlighted the need for revised policies in the light of new forces for change. Owing to the Natural England guidance requiring an expedient and fit for purpose assessment, it is not viewed as appropriate to examine in detail the environmental effects of continuing with the current set of policies.

3.2.3 'Best for environment' Alternative

The primary purpose of the Management Plan as a whole is to conserve and enhance natural beauty, so it should inherently represent the 'Best for environment' option. That said, the assessment may indicate where improvements to the environmental performance of individual policies within the Management Strategy

could be made. Development of alternative policy wording would be the most useful approach to adopt.

Development of alternatives will therefore be focussed where policies are identified as having an adverse environmental effect.

4 Findings of the SEA

4.1 The performance of policies against SEA Objectives

Policies from the Management Strategy have been individually assessed against each of the SEA Objectives. Recording effort has been directed towards documenting adverse effects and uncertainties, rather than beneficial effects.

Table 4 Key to assessment matrix

S++	Strongly supports the SEA objective
S+	Supports the SEA objective
N	Is neutral in effect
C- (C = conflicts)	Potentially works against the SEA objective
C- -	Strongly works against the SEA objective
X	Effects uncertain (more information is required to ascertain effects, or impact depends on implementation)

Within the following Matrices, text in **aqua** under the 'Recommendations to improve environmental performance' column signifies additional text for inclusion in the policy.

Theme 1 Landscape

Landscape Character and the Historic Environment

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
L1	Support the development and delivery of environmental schemes and projects aimed at maintaining and improving the landscape character, historic environment and local distinctiveness of the AONB.	S++	S++	S+	S+	S+	S+	N	N	N	X	<p>This policy is supportive or neutral when applied to individual SEA Objectives.</p> <p>Neutral: There are weak potential indirect, positive, and cumulative effects on human health though improved quality of life from improvements to landscape character.</p> <p>Interrelationships: There are potential conflicting interactions between landscape, biodiversity, and heritage dependent upon how schemes are implemented. Habitat management can conflict with archaeological / heritage site management and an appropriate balance needs to be struck on an individual scheme/project/site basis. With appropriate mitigation the overall effect should be neutral or beneficial.</p>	The impact of individual schemes should be assessed with particular reference to the relative importance of selected sites for biodiversity, geodiversity and heritage.
L2	Develop and encourage assessment models and tools that enable effective and targeted management and monitoring of the AONB's natural, historic and cultural landscape.	S++	S++	S++	S++	S+	S+	S++	N	N	N	<p>Positive: Development of monitoring tools will allow for rapid recognition of adverse change in the AONB and inform management adaptation.</p>	

Environmental Quality and Climate

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
EQC 1	Support and encourage environmental and renewable energy schemes, actions, programmes and policy aimed at maintaining and improving the natural resources of the AONB and that are in keeping with the sustainable management of the landscape.	X	X	X	X	N	N	S+	N	N	X	<p>Depends on implementation: This policy has some uncertain impacts (as worded) on the SEA objectives for biodiversity, geodiversity and landscape. Impact is dependent upon type of renewable and also location and individual design.</p> <p>Bio-energy crops can have significant adverse effects on landscape character and biodiversity, (habitats and species) especially in relation to cumulative impacts. Depends on definition of 'sustainable management' of land, does not necessarily include conserving and enhancing natural beauty, or maintaining landscape character.</p> <p>Sustainable management of the landscape could be expanded upon, as its not clear what the AONB's definition of sustainability is.</p> <p>Sustainable management in AONB terms should inherently include maintaining the local landscape character.</p> <p>Application of Policy L1 should mean that only those renewable projects supported and delivered under this policy are those which complement the landscape character.</p> <p>Positive: potential indirect effects through improvements in air quality from reduced emissions. Contributions to UK commitment to reduce carbon emissions.</p>	<p>Alter policy wording to include 'maintaining landscape character of the AONB', not just 'sustainable management' as these are different.</p> <p>'Support and encourage environmental and renewable energy schemes, actions, programmes and policy aimed at maintaining and improving the natural resources of the AONB and that are in keeping with the sustainable management of the landscape, maintain landscape character and conserve, and where possible enhance, natural beauty.'</p> <p>Another way would be to include a definition of what will be viewed as 'sustainable management' within the AONB. Schemes must be assessed on an individual basis and may require EIA.</p>

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
EQC 2	Support and encourage schemes that will help to reduce, recycle and re-use waste in a sustainable manner whilst respecting the landscape character of the AONB.	N	N	N	N	S++	S+	S+	N	N	N		
EQC 3	Seek to understand and plan to exploit or minimise possible impacts arising from climate change.	S+	S+	S+	S+	S+	S+	S++	N	N	X	Positive: Increased understanding of climate change impacts will enable management and decision-making within and affecting the AONB to be informed. This includes management for landscape, biodiversity, geology, heritage, protection of natural resources, land, air, water and climate.	

Biodiversity and Geodiversity

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
BG1	In partnership with others, support and encourage conservation and enhancement actions for key habitat and species within the AONB.	S++	S++	S++	N	N	S+	N	N	N	X	Interrelationships: Habitat management can be in conflict with archaeological site management and an appropriate balance needs to be struck on an individual site basis. With appropriate mitigation the overall effect should be neutral or beneficial.	Measures would be most appropriate at the implementation stage to ensure biodiversity projects have regard to other aspects of natural beauty, in particular heritage.
BG2	Encourage actions that serve to conserve, enhance and promote geodiversity within the AONB.	S++	S+	S+	N	S+	N	N	N	N	N	Interrelationships: Management for geology, in particular within the World Heritage Site can be in conflict with the protection of material assets. Particularly in relation to the Shoreline Management Plan.	Alter policy wording to include ' ...in particular within the Dorset and East Devon Coast World Heritage Site. '

Coast

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
C1	Conserve and enhance the tranquil, unspoiled and undeveloped character of the coastline and estuaries and encourage improvements to coastal sites damaged by past poor quality development or intensive recreational pressure.	S++	S++	S+	S++	S+	S+	S+	S+	N	X	<p>Interrelationships: Potential conflict between the need to protect material assets from coastal flooding and the geology and specialised biodiversity within the Dorset and East Devon Coast World Heritage Site, which would benefit from the removal of inappropriate coastal defence structures which interfere with natural coastal processes, erosion in particular.</p> <p>Positive: Improving coastal sites damaged by intense recreational pressure will bring significant benefits to the AONB.</p>	
C2	Support and encourage action that maintains the highest standard of bathing water quality and litter management in the estuaries and along the coast.	S++	S+	S+	N	S+	N	S+	N	N	N	<p>Positive: Improved water quality, in biochemical, and physical terms from reduced litter. Improved coastal environmental quality will support and potentially boost the tourism sector.</p>	

Farming and Land Management

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
FLM1	Promote and support appropriate and positive land management, diversification and agri-environment schemes that are in keeping with the purposes of AONB designation.	S++	S++	S+	S+	S+	S++	S+	N	N	N	Positive: Rural diversification can help to sustain communities, enable small farms to remain viable and potentially increase rural employment opportunities.	
FLM2	Support initiatives that enable the land management sector to adapt to change and remain viable, whilst maintaining and enhancing the natural beauty of the AONB.	S+	S+	S+	S+	S+	S+	N	S+	S+	N	Positive: Its clear from the policy that initiatives which would be detrimental to the AONB purpose would not be supported. Diversification can help to sustain rural communities, and potentially increase employment opportunities.	

Theme 2 Sustainable Development

Access, Recreation and Tourism

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
ART1	Encourage and support the provision of high quality physical access for as wide a range of users as possible and the on-going development of key recreational routes.	X	X	X	X	X	X	N	S++	S+	X	<p>Depends on implementation: Increased infrastructure could damage habitat, lead to more frequent use and further damage. However, individual schemes will still have to have regard to conserving and enhancing natural beauty. If mitigation is in place (through assessment of individual schemes) then neutral effects are the more likely outcome.</p> <p>Negative: Potential negative impact on the feelings tranquillity for individuals can result from increased infrastructure or increased use.</p> <p>Positive: Increased access may encourage a wider range of people to engage in countryside recreation, and exercise. Enabling increased access by all may encourage a more diverse population. Increased use of the countryside can lead to an increased awareness and appreciation amongst users.</p>	Although the supplementary text qualifies that access will not be at the expense of natural beauty, the policy itself needs to make this clear. Alter policy wording to 'Encourage and support the provision of high quality, sensitive , physical access for as wide a range of users as possible and the on-going development of key recreational routes.'
ART2	Encourage and support sustainable tourism activities within the AONB by promoting the special qualities of the landscape.	S+	X	X	X	N	N	S+	N	X	X	<p>Depends on implementation. Promotion could lead to more frequent use damaging sensitive habitats or causing disturbance of important species etc.</p> <p>Positive: Encouraging current tourism activities to become more sustainable and respect the special qualities of the AONB will have positive effects for all aspects of the environment.</p>	Need to ensure there are robust guidelines or AONB advice on what is considered sustainable in terms of AONB distinctive features. Any promotion needs to be accompanied by promotion of best practice codes of conduct.

Planning and Development

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
P1	Encourage the development of guidelines and design guides to support high quality sustainable development in the AONB.	S+	S+	S+	S+	S+	N	S++	N	N	N	Positive: Providing guidance to developers will ensure new development and conversions respect the character of the built environment and complements landscape character.	Sustainable in terms of the AONB needs to include protection and enhancement of AONB distinctive features, not just the usual sustainable design principles. Alter policy to '...sustainable development which complements and respects the AONBs landscape and historic character. '
P2	Provide advice and support on planning policy and development to enable the special qualities of the historic and landscape character to be conserved and enhanced.	S++	S++	S++	S++	S+	S+	S+	S+	N	S+	Positive: Impacts are positive across the range of SEA objectives.	Need to ensure the advice is robust, strong and clear.

Transport and Highways

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
T1	Promote the development of high quality, integrated and sustainable transport services and initiatives in the around the AONB.	X	S+	S+	N	N	N	N	S+	S+	N	<p>Depends on implementation. Infrastructure for buses (stops, raised curbs etc) can have detrimental impact on settlement character. Increased access - cycle lanes etc. into more rural areas can increase urban feel (urbanisation).</p> <p>Positive: Beneficial effects from increases in sustainable and 'joined-up' transport options, reducing emissions and increasing local air quality. Taking cars off the roads within the AONB should help improve tranquillity in rural areas.</p> <p>If transport options include commuting options for cycling, then there may be long term, positive impacts on health.</p>	Actions under this policy should be subject to the purpose of AONB designation.
T2	Work to ensure road and transport schemes within the AONB have regard to the purposes of AONB designation.	S+	S+	S+	S+	S+	N	X	N	N	N	<p>The duty to have regard to the AONB purpose should mean that enhancements are delivered under any road and transport schemes within or affecting the AONB.</p>	Strengthen policy by rewording to 'Ensure...'

Rural Economy and Services

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
RES1	Encourage the principle of local markets and local produce where it adds value to the local economy.	X	X	X	X	X	X	N	S+	N	X	<p>Negative: Potential indirect effects if inappropriate land (e.g. biodiverse or heritage rich) is brought into agricultural use as a result of increased local demand for land based produce. Potential positive effects on E1-E6 where sustainable / organic / environmentally friendly land management practices are encouraged as a result.</p> <p>Interrelationships: Potential conflicts with SEA objectives for biodiversity and heritage which will depend upon how projects under this policy are implemented.</p>	Need to ensure that 'local produce' becomes synonymous with land management which maintains landscape character and the environment. Amend policy wording to demonstrate the need to encourage local and sustainable produce in terms of landscape, biodiversity and heritage etc. Needs to be local and 'sustainable' produce, and tie in with Policy FLM1.
RES2	Encourage the appropriate development of sustainable employment opportunities that are compatible with AONB objectives, promote good design and encourage people to continue to live and work within in their communities.	N	N	N	N	N	N	S+	S+	S+	N	<p>Positive: Potential positive effect on demographics, and community vitality if more job opportunities are created for local young people, as this would help to rebalance the ageing population.</p> <p>If the sustainable employment opportunities are in sectors which manage the landscape, such as forestry and farming, then there could be positive effects on the character of the AONB.</p>	Alter policy wording to '...compatible with the AONB purpose and objectives...'
RES3	Develop monitoring and research that serves to quantify and assess the economic value of the environment in the AONB.	S+	S+	S+	S+	N	N	S+	N	N	N	<p>Positive: Potential indirect effects through increased recognition of the economic value of landscape leading to more resources being diverted to maintaining landscape. Especially if actions include promoting e.g. Visitor payback schemes. Realising the economic value of woodland may help bring appropriate areas into management, where this is compatible with the AONB purposes.</p>	The research under this policy should consider the indirect economic value, such as the ecosystem services like flood attenuation, carbon sequestration, benefits for mental well-being etc. as well as its more obvious value for agriculture and tourism.

Community and Culture

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
CC1	Support local community engagement in physical, cultural and natural heritage initiatives within the AONB.	S+	S+	S+	S++	S++	S+	N	N	N	N	Positive: Indirect effects on health both physical and mental from interaction with natural environment, experiencing tranquillity (biophilia effect).	At the Delivery Plan level the implementation should ensure that the initiatives are socially inclusive in terms of enabling all sectors of the community including the visiting community to participate in and benefit from the activities.
CC2	Work with others to strengthen community capacity, resources, information, services and facilities within the AONB.	N	N	N	N	S+	N	N	N	S++	N	Positive: Strengthening community capacity may help to encourage younger people to remain in the AONB and rebalance the currently ageing population. Community engagement should help create a sense of ownership / stewardship of the AONB and its features.	

Theme 3 Management

Communication Education and Awareness

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
CEA1	Promote and support the education, understanding and appreciation of the natural and cultural landscape of the AONB.	S+	S+	S+	S+	S+	S+	S+	N	N	S++	Positive: Potential long term indirect effects through greater understanding leading to behaviour change of organisations, residents, visitors. Potential to engage a broader cross-section of AONB communities.	
CEA2	Promote and highlight good practice within the AONB and the role and activities of the AONB Partnership.	S+	S+	S+	S+	S+	S+	S+	S+	N	S++	Positive: Potential indirect effects through greater understanding leading to behaviour change of organisations, residents, visitors.	

Management, Organisation and Partnerships

Policy No.	Policy	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	Summary of environmental implications of policies	Recommendations to improve environmental performance
M1	Encourage co-ordination and partnership amongst the wide range of national and regional agencies and organisations to secure funding for the care and enhancement of the AONB.	S+	S+	S+	S+	S+	S+	S+	S+	N	N	Positive: Opportunity to bring enhancement to the AONB.	
M2	Ensure that the AONB Management Strategy is reviewed every 5 years and that the Action Plan is annually updated and made publicly available.	S+	S+	S+	S+	S+	S+	S+	N	N	N	Positive: Continuing review will enable management and policies to address the most pressing forces for change on the environment of the AONB.	Review needs to include update of forces for change and relevant plans, policies and legislation etc. Annual review of action plan should include targeting of action towards currently most threatening forces for change - indicated through monitoring over last plan year.

4.2 General Recommendations

4.2.1 Interpretation of policies

All the policies in the Management Strategy must be interpreted in the light of:

- the Key Objective of the policy's Sub-theme
- the Sub-theme Vision
- the 20 Year Vision for the AONB
- the **statutory purpose** of the East Devon AONB designation, that is to conserve and enhance the area's natural beauty

Where there are any doubts or conflicts, policies should be interpreted using a 'purposive' approach which returns to the statutory purpose of the AONB designation, '*to conserve and enhance natural beauty*'.

In practical terms this means that:

- where there may be more than one possible interpretation of a policy, the one which reflects the aim behind the policy, (which will always be to conserve and enhance the natural beauty of the AONB) **must** be applied.
- where there appears to be an irreconcilable conflict between two or more policies, or an action under one policy conflicts with another policy, the interpretation which achieves the statutory purpose of the AONB **shall** be made.
- where any action, plan or project, decision, (& etc.) could be interpreted as being supported by any particular policy (or policies), but its exercise would conflict with conserving and enhancing natural beauty, the statutory purpose to conserve and enhance natural beauty **shall** override any support provided by the policy.

These basic principles should be made explicit within the AONB Management Strategy.

5 Findings of the SA

5.1 The performance of policies against SA Objectives

Management Strategy policies have been individually assessed against each of the SA Objectives. Recording effort has been directed towards documenting adverse effects and uncertainties, rather than beneficial effects.

Table 5 Key to assessment matrix

S++	Strongly supports the SEA objective
S+	Supports the SEA objective
N	Is neutral in effect
C- (C = conflicts)	Potentially works against the SEA objective
C- -	Strongly works against the SEA objective
X	Effects uncertain (more information is required to ascertain effects, or impact depends on implementation)

The following 5 figures show the summary results for each of the SA Objectives. The figures show the total number of policies which were Supportive, Neutral, Conflicting or Uncertain in their effects on the SA Objective. Included is a summary of the overall appraisal of all the policies against the Objective is also provided, along with recommendations for improvement where appropriate. Text in **aqua** under the 'Recommendations for improving environmental performance' heading signifies additional text for inclusion in the policy.

SA Objective		Supportive	Neutral	Conflicting	Uncertain
S1	To create more vibrant, cohesive, safe and mixed communities	24	2	0	0
	Policy References	L1, EQC1, EQC3, BG1, BG2, C1, C2, FLM1, FLM2, ART1, ART2, P1, P2, T1, T2, RES1, RES2, RES3, CC1, CC2, CEA1, CEA2, M1, M2	L2, EQC2		
<p>Summary of Policy Appraisal: Overall the Strategy is very supportive of this objective. Neutral impacts result from L2 which targets landscape enhancements and EQC2 which is centred on waste minimisation.</p> <p>Recommendations for improving environmental performance: The performance of the Management Plan as a whole, against this objective, would most appropriately be improved at the Delivery Plan stage, by including community-led actions under L2 and EQC2. For example through support for Community Energy Supply Companies (Community ESCOs) under EQC2.</p>					

SA Objective		Supportive	Neutral	Conflicting	Uncertain
S2	To protect the quality and character of individual settlements and communities	19	2	0	5
Policy References		L1, L2, EQC3, BG1, C1, C2, FLM1, FLM2, P1, P2, RES1, RES2, RES3, CC1, CC2, CEA1, CEA2, M1, M2	EQC2, BG2		EQC1, ART1, ART2, T1, T2

Summary of Policy Appraisal:

Overall the Strategy is very supportive of this objective.

Uncertainty surrounds EQC1 where impacts depend on implementation as there are potential adverse impacts on settlement character from inappropriate renewable energy schemes. Cumulative impact of small scale renewable energy schemes may be more detrimental than a single large scale scheme. However this should be balanced by the fact that renewable energy schemes may encourage investment and employment in the area. ART1 encourages increased physical access which can, depending upon the way schemes are implemented, impact upon the character of settlements, biodiversity and landscape if infrastructure provision is not sensitive.

Recommendations for improving environmental performance:

Alter the policy wording of ART1 to include 'sensitive' as well as high quality access. ART2 would benefit from further qualification of what is deemed 'sustainable' in terms of the AONB. Sustainability should intrinsically include conserving and enhancing the historic character of settlements.

SA Objective		Supportive	Neutral	Conflicting	Uncertain
S3	To protect the environment, people and properties from flood risk	12	14	0	0
	Policy References	L2, EQC3, BG1, BG2, C1, P1, P2, RES3, CC2, CEA1, M1, M2	L1, EQC1, EQC2, C2, FLM1, FLM2, ART1, ART2, T1, T2, RES1, RES2, CC1, CEA2		
<p>Summary of Policy Appraisal: The Strategy supports this objective. But, there are several areas where policies have a neutral effect. This is mainly owing to the specificity of this objective towards flood risk management. Policies only very weakly and indirectly influence this.</p> <p>Recommendations for improving environmental performance: There is the potential to improve performance through the Action Plan by encouraging environmental schemes under Policy L1 to include habitat enhancement which serves to attenuate or improve water holding capacity to avoid 'flash' flooding events. Or by building upon Environment Agency Voluntary Flood Warden schemes, under Policy CC1 or CC2, this would directly support flood risk management in particular in relation to property, and the built historic environment.</p>					

SA Objective		Supportive	Neutral	Conflicting	Uncertain
S4	To promote the development of an economy that supports social and environmental objectives	21	5	0	0
	Policy References	L1, EQC1, EQC2, EQC3, BG1, BG2, C2, FLM1, FLM2, ART1, ART2, T1, T2, RES1, RES2, RES3, CC1, CC2, CEA2, M1, M2	L2, C1, P1, CC1, CEA1		
<p>Summary of Policy Appraisal: The Strategy strongly support this objective. Since the protection and enhancement of natural beauty requires land to be managed in a sensitive manner, it is unsurprising that the plan supports the development of an economy which contributes to environmental objectives. The social impacts of sustainable land management, and lifestyles supported by the Strategy as well as environmental improvements, have great potential for indirect, long-term, cumulative, positive social benefits in terms of quality of life and well-being of communities.</p>					

SA Objective		Supportive	Neutral	Conflicting	Uncertain
S5	To minimise the consumption of natural resources including fossil fuels, mineral, land take and water	16	10	0	0
	Policy References	L1, EQC1, EQC2, EQC3, FLM1, FLM2, ART1, ART2, P1, T1, T2, RES1, RES2, CEA2, M1, M2	L2, BG1, BG2, C1, C2, P2, RES3, CC1, CC2, CEA1		
<p>Summary of Policy Appraisal: The Strategy supports this objective. Neutral impacts result from L2 which targets landscape enhancements, BG1 and 2 which focus on biodiversity and geodiversity enhancements, C1 and 2 which focus on the coastal area.</p> <p>Recommendations for improving environmental performance: Actions could be delivered under most of the neutral policies which would support this objective. For example the Sustainable Development Fund (SDF) could support a project to encourage energy and water efficiency etc.</p>					

6 Conclusions from Assessments

The findings of the SEA and SA are that the policies in the Management Strategy will not give rise to any significant adverse environmental effects and that the policies are largely supportive of the principles of sustainable development.

The assessment process was very conservative in its evaluation of environmental effects, applying the precautionary principle. This approach has highlighted some policies which have the potential for adverse effects at the delivery level; in particular, policies relating to the Access, Recreation and Tourism, and the Rural Economy and Services Sub-themes, and the specific policy on renewables (EQC1). Potential impacts for all these are in relation to SEA Objectives for landscape, heritage and biodiversity. Given the environmentally protectionist nature of the AONB Management Plan approach, any residual potential for negative effects will be screened out during the development and implementation of actions. This, plus the controls afforded by legislative measures to protect landscape, heritage and biodiversity will result in no adverse environmental effects.

In terms of sustainability the Management Strategy is largely either supportive or has a neutral impact on the achievement of sustainability objectives. Neutral impacts tend to occur where there is no direct link between the policy and the SA Objective.

The 20 Year Vision for the AONB is founded on the principle of sustainable development, to secure protection for the area's natural beauty and deliver an enhanced landscape which can be enjoyed by and benefit present and future generations. This assertion is supported by the outcome of these assessments.

Whilst the policies will not result in any significant adverse environmental effects, they could be enhanced. Ensuring the recommendations are taken into account in the Management Strategy revisions following the consultation period will improve their performance and ability to conserve and enhance the AONB.

7 Monitoring

The SEA Directive requires that the Environmental Report includes:

'...a description of the measures envisaged concerning monitoring.'
(Article 10).

Regulation 17 of the SEA Regulations requires the Responsible Authority (the AONB Partnership acting for the local authorities) to monitor the significant environmental effects of the implementation of the Management Plan. The purpose of monitoring is to identify unforeseen adverse environmental effects at an early stage and allow for appropriate remedial action to be taken.

Existing appropriate monitoring arrangements may be used so as to avoid duplication of monitoring.

7.1 Proposals for monitoring

The Management Strategy has identified primary and secondary measures for progress (Theme Indicators), and these are detailed at the end of each Management Sub-theme within the Strategy. These will assist with measuring the success of the policies in meeting the AONB objectives. Some of these could also assist in indicating whether or not the AONB Management Plan (Strategy and Delivery) is meeting the SEA Objectives.

In addition, a series of Primary Indicators (Environmental) were identified as part of the SEA Scoping stage. A set of optional Indicators relating to sustainability were also identified. Monitoring for SEA requirements should seek to make use of existing datasets and existing collection mechanisms. Careful consideration should be given to the selection of Indicators and some basic principles should be followed.

Table 6 Attributes of datasets to consider in selection for monitoring

	Dataset attribute	Issues to consider
1.	resolution/disaggregation	The geographical scale at which data is collected will affect how this can be disaggregated to the AONB area The greater the resolution the more useful the data will be
2.	frequency of collection and update	This affect its usefulness for identifying adverse effects rapidly enough to make remedial action effective, with more frequent updates being the most useful
3.	continuing availability	Long-term datasets are more valuable monitoring tools than 'one-off' specially commissioned data
4.	specificity/confidence	Specificity refers to whether the indicator is sufficiently specific to be measuring the effect of the policy directly. Or whether it is an indirect indicator of effect. This has implications for the level of confidence that can be attributed to the interpretation of the indicator
5.	cost of collection	Costs should not be onerous so as to prevent ongoing collection and data management

Numerous organisations are collecting data relevant to the AONB which could be used as indicators of environmental change. However, difficulties arise in attributing the environmental change to specific sources, making it problematic to identify which plan or strategy is actually impacting on the environment, whether positively or negatively. Therefore a degree of interpretation is required.

It is not proposed that the environmental performance of all the policies be monitored. A selection of indicators across the range of Management Sub-themes should be chosen based primarily on the appropriateness of the datasets in terms of availability, frequency and disaggregation possibilities etc. to ensure the effects are discernable and attributable at the scale of the AONB.

Where data is indicated as being collected by, or is the responsibility of a relevant authority⁹, it could be argued that it should be funding and managing the collection and analysis of this data as part of the process of demonstrating to the AONB Partnership, and ultimately Defra, that it is complying with the section 85 duty and having appropriate regard to the AONB.

⁹ 'relevant authority' in relation to AONBs is defined in section 85(2) of the Countryside and Rights of Way Act 2000

7.2 Environmental Indicators (SEA)

The table makes suggestions for possible indicators to take forward in the monitoring commitment for the SEA. Careful consideration will need to be given as to which should be taken forward.

Table 7 Proposed monitoring of significant environmental effects

Possible Indicator	Measure	Sources and Data collection	Comments (Frequency of measurement, limitations, interpretation)	Relevant Policies / Management Theme Indicators
E1 To protect and enhance landscape				
Locally distinctive field boundaries	% changes in quality of locally distinctive field boundaries Change in length of locally distinctive field boundaries	Historic Landscape Characterisation (HLC) maps January 2005	Systems not yet in place. Importance and quality criteria to be locally determined. Data would need to be collected locally Possible to use HLC but criteria need to be developed	L1, L2, BG1, BG2
Extent of woodland cover Extent of woodland type(s)	% woodland cover % cover by woodland type	Forestry Commission		Proposed Primary Indicator under Landscape Character and Historic Environment
Key ridges and views	Changes in key ridges and views	AONB Fixed Post Photography (FPP) Project	Qualitative data Sites to be locally determined following baseline survey work, and data collected locally (photographic evidence from fixed point photography)	
Change in levels of tranquillity	Change in percentage area classified as tranquil	Tranquillity mapping from CPRE	Not an ongoing monitoring programme. Currently available only as a jpeg image not as an interrogatable dataset	C1
Extent of Dark skies	Change in extent of Dark skies	Dark Skies mapping from CPRE	Not an ongoing monitoring programme Currently available only as a jpeg image not as an	C1

Possible Indicator	Measure	Sources and Data collection	Comments (Frequency of measurement, limitations, interpretation)	Relevant Policies / Management Theme Indicators
			interrogatable dataset	
Length of undeveloped / unspoilt coast	Change in overall length of undeveloped / unspoilt coast	Local Planning Authority Would need to be collected locally	Should form part of monitoring of the Local Development Framework baseline environment Suggest annual reporting	C1
Area of agricultural land under sensitive environmental management	% of land managed under all agri-environment schemes	Data available from Defra. 2006 figures available	This measure is indicative only and makes the assumption that land under agri-environment schemes is managed for the benefit of landscape	FLM1 Proposed Indicator under Farming and Land Management
E2 To protect and where practical enhance biodiversity (habitats)				
Condition status of SSSIs	% by area of biological SSSI in 'favourable condition'	Natural England PSA Target - SSSI favourable condition data	Ongoing dataset - PSA Target	BG1 Proposed Indicator under Biodiversity and Geodiversity
Condition status of SSSIs	% by area of geological and geomorphological SSSI in 'favourable condition'	Natural England PSA Target - SSSI favourable condition data	Ongoing dataset - PSA Target	BG2 Proposed Indicator under Biodiversity and Geodiversity
Extent of BAP habitats outside statutorily designated sites	% change in extent of BAP habitats outside statutorily designated sites Suggest focussing on lowland heath, unimproved grassland, spring-line mires	Not yet identified	Not currently available Potentially collated through South West Biodiversity Partnership Focus of data collection and measure should be outside statutory sites. Statutorily protected sites have legal measures to protect them from inappropriate management. Protection for non-statutory sites/ wider landscape is considerably less robust. The management of these sites is therefore likely to be more influenced by the policies in the Management	BG1, L1, FLM1

Possible Indicator	Measure	Sources and Data collection	Comments (Frequency of measurement, limitations, interpretation)	Relevant Policies / Management Theme Indicators
			Strategy Unimproved grassland will also provide some indication of changes in land management practices. In particular in relation to increased demand for local food production	
	Number of Parishes with a Biodiversity Audit	Devon County Council and District Council	New project underway by Devon County Council	BG1, BG2
E3 To protect and enhance fauna and flora (individual species)				
Population of farmland birds	Change in population size	Defra PSA Target	Ongoing dataset - PSA Target. Problematic to attribute to AONB area	BG1
Biodiversity Action Plan species	Trends in population	Data availability depends on species chosen and likely to involve substantial local data collection Devon Biodiversity Records Centre, Natural England	Characteristic species to be locally determined based on EDDC BAP Trends need to be interpreted in the light of climate data and other information Need to be aware of level of 'recording effort' and its influence on the level of confidence attributable to the indicator	BG1
E4 To maintain cultural heritage (including architectural and archaeological heritage)				
Condition of Scheduled Ancient Monuments (SAMs)	% Scheduled Ancient Monuments (SAMs) in favourable condition	English Heritage and Local Authorities	Continuing database because of legislative requirement to maintain register. No condition data available yet	L1
Listed and unlisted buildings considered to be at risk	Change in number of buildings on the 'Buildings At Risk Register'		Continuing database because of legislative requirement to maintain register. Investigate 'Heritage at Risk Register' as this may serve purpose better	L1 Proposed Indicator under Landscape Character and Historic Environment.
Success of farmers	Number of businesses	East Devon Farmers		RES1

Possible Indicator	Measure	Sources and Data collection	Comments (Frequency of measurement, limitations, interpretation)	Relevant Policies / Management Theme Indicators
market	supporting local farmers markets	Markets		Proposed Indicator under Rural Economy and Services
E5 To protect material assets including natural resources				
Ecological status of watercourses	% of AONB watercourses meeting 'good ecological status'	Data from the Environment Agency through Water Framework Directive performance monitoring in the South West		BG1, C2 Proposed Indicator under Coast
Adopted / Beachwatch beaches	% of beaches adopted in MCS Adopt-a-Beach scheme or Beachwatch Number of annual beach cleans supported by the Local Authority	Marine Conservation Society Local Authority	Beachwatch Report annually in Spring This measure indicates the number of beaches with regular community involvement in beach cleans This measure will cover private beaches as well as Local Authority managed beaches	C2, C1, CC1, CC2
Quality of designated Bathing Waters (under the Bathing Waters Directive)	% samples in the Bathing Season meeting 'Good' or 'Excellent' standards	Environment Agency Ongoing dataset. Statutory requirement to monitor under the Bathing Waters Directive.	Minimum of 20 samples collected annually during Bathing Season (15 May to 30 September, inclusive, in England) Suggest using trends from year to year to identify underlying/chronic impacts	C2 Adapted from Proposed Indicator under Coast
E6 To protect and enhance soil quality				
Agricultural land under Good Soil Management	% by area of agricultural land with a Soil Management Plan in place	Defra agri-environment schemes	Suggested annual analysis	EQC1, FLM1, FLM2,
Run-off related flood incidents	Trends in run-off related flood incident	Environment Agency	Need to interpret indicator in the light of rainfall data, new flood prevention schemes as well as land	L1, FLM1, EQC1 Proposed Indicator under

Possible Indicator	Measure	Sources and Data collection	Comments (Frequency of measurement, limitations, interpretation)	Relevant Policies / Management Theme Indicators
	reports		management changes, such as those identified by the agricultural land under Good Soil Management Suggested annual analysis of incidents	Environmental Quality and Climate
E7 To protect water, air and climate				
Ecological status of watercourses	% of AONB watercourses meeting 'good ecological status'	Data from the Environment Agency through Water Framework Directive performance monitoring in the South West	It will be extremely difficult to attribute the effects of Management Strategy policies	BG1, C2 Proposed Indicator under Coast
Quality of River Water	Changes in classifications for Chemistry and Nutrients	Environment Agency	Of particular relevance for land management is the nutrient levels (testing for nitrate and phosphate)	EQC1 Proposed Indicator under Environmental Quality and Climate
Renewable energy schemes	% renewable energy schemes with a neutral or positive impact on the AONB's designated purpose	Local Planning Authorities	Annual collation of planning data. Limitation is that this only measures those schemes which require planning permission	EQC1, EQC3 Adapted from Proposed Indicator under Environmental Quality and Climate
E8 To safeguard human health				
Quality of designated Bathing Waters (under the Bathing Waters Directive)	% samples in the Bathing Season meeting 'Good' or 'Excellent' standards	Environment Agency Ongoing dataset. Statutory requirement to monitor under the Bathing Waters Directive.	Minimum of 20 samples collected annually during Bathing Season (15 May to 30 September, inclusive, in England). Monitoring from 2 weeks before 15 May. Suggest using trends from year to year to identify underlying/chronic impacts.	C2 Adapted from Proposed Indicator under Coast
E9 To ensure no adverse effect arises on population (i.e. demographic balance)				
Full-time farmers and employees	Change in number of full-time farmers and	Defra Farm Census	2004 dataset now available Infrequent collection	L1

Possible Indicator	Measure	Sources and Data collection	Comments (Frequency of measurement, limitations, interpretation)	Relevant Policies / Management Theme Indicators
employees	full-time farmers and employees		It will be extremely problematic to attribute the cause of demographic change	
E10 To avoid significant adverse effects between the above interrelationships				
Heritage mitigation used in biodiversity schemes	Number of biodiversity schemes taking account of relevant heritage	Natural England & others English Heritage Public Bodies	Would need to be collated by AONB Partnership Potentially time intensive, suggest a qualitative approach is adopted	L1, L2, BG1
Biodiversity mitigation used in heritage schemes	Number of heritage schemes taking account of relevant biodiversity	English Heritage & others Natural England Public Bodies	Would need to be collated by AONB Partnership Potentially time intensive, suggest a qualitative approach is adopted	L1, L2, BG1

7.3 Sustainability Indicators (SA)

Table 8 Proposed monitoring of significant effects on sustainability

Possible Indicator	Measure	Sources of data	Comments	Relevant Policies/ Management Theme Indicators
S1 To create more vibrant, cohesive, safe and mixed communities				
Parishes and Towns with Parish/Town Plans (or their equivalent)	Change in number of up to date Parish/Town Plans which have regard to the AONB purposes	Local Authority / Community Council of Devon	Suggested annual frequency of monitoring	CC1, CC2 Adapted from Indicator under Community and Culture
Membership of local Amenity/Conservation groups	Membership numbers for the Otter Valley Association, Sid Vale Association and the Axe and Valley District Conservation Society	Otter Valley Association, Sid Vale Association Axe and Valley District Conservation Society	Suggested annual frequency of monitoring	CC1, CC2 Adapted from Indicator under Community and Culture
S2 To protect the quality and character of individual settlements and communities				
Settlements with Village Design Statements	Number of settlements with Village Design Statements	Local Authorities	Suggested annual frequency of monitoring	P1
Development Control decisions having regard to the AONB	% of planning permissions granted contrary to AONB purposes	Local Planning Authorities can use this measure to help report on how they are meeting their section 85 duty when delivering their planning functions	This measure indicates the contribution which the development control process is making towards protecting and enhancing the AONB	P2, EQC3, RES2
S3 To protect the environment, people and properties from flood risk				
Run-off related flood incidents	Trends in run-off related flood incident reports	Environment Agency	Need to interpret indicator in the light of rainfall data, new flood prevention schemes as well as land management changes, such as those identified by the agricultural land	L1, FLM1, EQC1 Proposed Indicator under Environmental Quality and Climate

Possible Indicator	Measure	Sources of data	Comments	Relevant Policies/ Management Theme Indicators
			under Good Soil Management Suggested annual analysis of incidents	
S4 To promote the development of an economy that supports social and environmental objectives				
Farm holding size	Change in average farm size/ number/ numbers employed/ numbers classified as p/t/ arable extent and livestock	Data available from Defra. Latest figures 2004 census	Collected infrequently, so will not be able to indicate adverse impacts rapidly	
Green Tourism Business Scheme accreditation	Trend in number of businesses with Green Tourism Business Scheme accreditation	Devon County Council Green Tourism Business Scheme	Suggest annual analysis of scheme	ART2, RES2 Proposed Indicator under Access, Recreation and Tourism
Success of farmers market	Number of businesses supporting local farmers markets	East Devon Farmers Markets	Needs to be interpreted in the light of other factors such as the general economic climate	RES1 Proposed Indicator under Rural Economy and Services
S5 To minimise the consumption of natural resources including fossil fuels, minerals, land take and water				
Recycling schemes	Number of community-led recycling schemes	Local Authorities		EQC1, EQC2, CC1, CC2
Traffic levels	Trend in traffic levels at fixed locations in the AONB	Highways Authority (Devon County Council)	Indicator of vehicle use, but indirectly a measure of the use of sustainable transport decisions	T1 Proposed Indicator under Traffic and Highways
Car sharing	Changes in car sharing behaviour	Car Share Devon (Local Authorities)	Would need to consider other impacts on car sharing, such as the general state of the economy	T1

7.4 Action where an adverse effect is found

Where any significant adverse effects on the environment are recorded as a result of the SEA monitoring programme, the AONB Partnership should review the policies which may be responsible. It must be borne in mind that the effect may in fact be as a result of another plan or programme. However it is in the interests of the AONB Partnership to examine and determine the possible causes. Relevant policies should be reviewed to help mitigate the environmental effect, whatever the cause.

8 Technical Review

Table 9 Limitations and Assumptions of the SEA Process

Limitation	Approach taken
Timescales	The SEA process takes account of the expediency required by the statutory Management Plan Review process. However this constrained the depth of assessment possible.
Scope and SEA Methodology	Natural England guidance recommends an expedient and fit for purpose assessment for AONB Management Plans. This had implications for the depth of assessment which could be undertaken. Consequently the assessment focussed on the policies. However a similar assessment could have examined the Key Objectives within each theme. It may have been useful to examine the geographic differences in policy coverage within the AONB, as there are likely to be particular areas that are constrained by a greater number of policies than others.
Uncertainty	There is a degree of uncertainty inherent in the assessment owing to the early stage of development of the baseline data collation being undertaken by the AONB.
Management Plan Review process	The independent SEA and SA assessments have been undertaken on the Consultation Draft Management Strategy. Significant revisions resulting from the consultation will need to be assessed.
Environmental Baseline	The environmental baseline data is being collated as part of the Management Plan Review process and will form part of the supporting documentation accompanying the final version of the Management Plan.
Key Assumptions	<p>The SEA was conducted at a high level, assessing the strategic policies.</p> <p>Actions within the Delivery Plans will be assessed at a later stage as an integral part of their development. The SEA identifies areas where assessment of actions is considered necessary.</p> <p>The SEA only examines alternatives where assessment indicates a significant adverse effect, as advised in the Natural England guidance.</p>

9 Appendices

Appendix 1. Forces for Change and Environmental Issues

Table 10 Forces for Change and Environmental Issues affecting the East Devon AONB

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
Landscape character and historic environment	The scale and nature of reform of the Common Agricultural Policy and its impact on land management needs to be harnessed in order to benefit the conservation and enhancement of the characteristic landscape and historic features of the AONB	Landscape	CAP reform and implications for future delivery of rural services
	There is concern about the ability to maintain low (financial) return landscapes that have a high ecological and/or historic environment value		Economic pressures forcing farming to become more intensive with subsequent impacts on landscape and soils
	The tranquillity and historic environment of the AONB may be affected by increased human activity resulting from a regional population growth		There is concern over pollution of land and water ranging from farming practice, fly tipping and dog fouling to litter on beaches
	Key landscape and historic environment features will be vulnerable to climate change and changing land management		Need for sustainable management of large scale woodland and appropriate management of small scale woodlands
	There is a need to combine Landscape Character, Historic Landscape Character, Historic Environment Record data and other more local sources to provide more relevant characterisation and local management guidance		Hedges, a significant feature in the landscape are in some places under threat from both neglect and/or poor management

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	Advances in crop modification, renewable energy technology and bio-energy are likely to impact on landscape character and the historic environment of the AONB		Orchards, once a common component of the farmed landscape of east Devon are being lost to neglect or removal
	The European Landscape Convention was signed by the UK government in 2006 and came into effect in 2007		The AONB is rich in historic features yet little coordination of the resource, its recording or its management has been made at AONB level.
			There has been a gradual loss of tranquillity in Devon as a result of light and traffic intrusion but the scale is undetermined at the AONB level
		Cross cutting issues	There is a need for improved land management techniques to ensure the negative impacts on the landscape are reduced e.g. soil erosion and pollution
			An understanding of the potential impact of climate change on the AONB is required to aid future management.
			There is concern about the ability to sustain the management of low (financial) return landscape habitat – e.g. lowland heath and woodland.
Environmental Quality and Climate	Changes to farming support require that good agricultural and environmental conditions be met that will help in the protection of soils and water resources.		
	Waste management regulations ¹⁰ prohibit unregulated burying and burning of agricultural waste on farms		

¹⁰ www.opsi.gov.uk/si/si2006/20060937.htm

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	The Water Framework Directive is placing high environmental standards on the management of water.		
	Catchment Sensitive Farming ¹¹ programme has been established that aims to control diffuse emissions of pollutants to levels consistent with the ecological sensitivity and uses of rivers, ground waters and other aquatic habitats. The Axe and Otter are target catchments		
	There is increasing interest in small scale renewable energy provision within the AONB		
	Devon aims to recover value from at least 40% of municipal waste by 2005/06, 45% in 2010/11 and 67% in 2015/16 ¹²		
	Both opportunities and challenges could arise from climate change impacts on the AONB's features and the activities within it.		
Biodiversity and Geodiversity	Biodiversity targets are integral to the new Environmental Stewardship scheme which aims to improve management of key habitats and species	Biodiversity	There is a need for biodiversity action planning at an AONB level and a greater understanding of habitat and species resource/condition
	The Natural Environment and Rural Communities Act 2006 places a duty on all public bodies to, when exercising their functions, have regard, so far as is consistent with the proper		The AONB Partnership needs to establish monitoring processes in order to assist in the development of biodiversity programmes

¹¹ www.defra.gov.uk/farm/environment/water/csf/index.htm

¹² www.devon.gov.uk/waste-manstrat1.pdf

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	exercise of those functions, to the purpose of conserving biodiversity ¹³		
	The South West Nature Map has been produced which shows the best areas, 'Strategic Nature Areas', to maintain and expand terrestrial wildlife habitats at a landscape scale. ¹⁴		Habitat and species loss and habitat fragmentation has occurred as a result of agricultural change, forestry, mineral workings and development
	The potential impacts of climate change on the species and habitats of the AONB are only partly understood		Improved management of key habitats is needed
	There is an opportunity for Biodiversity Action Planning at the community/parish level and a greater understanding of the habitat and species resource /condition.		There is a need for restoration and aftercare arrangements for mineral sites
	<i>Habitat and species loss and habitat fragmentation have occurred as a result of agricultural change, forestry, mineral workings and development although increasingly measures being developed to control this.</i> ¹⁵	Cross cutting issues	The potential impacts of climate change on the species and habitat of the AONB needs to be more fully understood
	<i>Government (DEFRA) targets have been set for both SSSI management and farmland birds</i> ¹⁶		
	95% of the area of SSSIs should be in favourable condition by 2010 - (currently 68.6% in East Devon AONB). ¹⁷		
	Reversing the long term decline in the number of farmland		

¹³ www.defra.gov.uk/wildlife-countryside/pdfs/biodiversity/pa-guid-english.pdf

¹⁴ www.swenvo.org.uk/nature_map/index.asp

¹⁵ Environmental Impact Assessment (Agriculture) (England) (No. 2) Regulations (Defra 2006)

¹⁶ Defra Public Service Agreement Targets 6 and 7

¹⁷ Natural England (2007)

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	birds by 2020.		
	Designation of Dorset and East Devon Coast World Heritage Site is serving to develop earth heritage and geological related initiatives.		
	There is a continuing need for the sensitive restoration and after care arrangements for mineral sites		
Coast	There have been water quality improvements across the area as a result of European directives, private investment programmes and Environment Agency supported initiatives which are serving to improve the standard of bathing waters		
	The adoption (and review in 2008) of a Shoreline Management Plan ¹⁸ provides a strategic framework for coast defence decision-making and investment		
	Climate change, storm events and sea level rise will have a major impact on coastal and estuary infrastructure at certain locations and hard decisions will need to be taken about the appropriate response		
	Natural England has commended the work being led by Europarc Atlantic Isles on 'linking land & sea' & their publication 'Making the Connections' ¹⁹		

¹⁸ www.sdadcaq.org/SMP.html

¹⁹ www.europarc-ai.org/eai-publications

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
Farming and Land management	Global markets have a significant influence on the viability and activities of farming and forestry practice in the AONB		
	There is increasing interest in niche and local produce which is helping some landowners to secure better gate prices		
	Reform of the Common Agricultural Policy is steering change in farming for public benefit for example through support for environmental stewardship		
	Woodland is increasing in value and there is growing interest in wood as a sustainable energy source		
	An understanding of the potential impact of climate change on the AONB is required to aid future land management.		
	There is concern over the ability to sustain the management of low (financial) return landscape habitat– e.g. lowland heath.		
	There may be pressure for new and probably larger farm buildings as a consequence of agricultural restructuring		
Access, recreation and tourism	There is a desire to spread the tourism season to the ‘shoulder periods’ of spring and autumn through targeted events and special interest activities	Access, recreation and tourism	
	The impact of the tourism industry, and associated activities, on the environment, needs to be minimised	Cross cutting issues	The relationship between tourism and the enhancement and care of the landscape would benefit from further development

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	New access has been mapped in open countryside and there will be future management implications on the proposals for coastal access improvements contained within the Marine Bill ²⁰		
	Development and promotion of recreational routes needs to take into consideration sustainable tourism opportunities		
	Recreational and car park counters installed at key locations throughout the AONB are being used to aid monitoring		
	The relationship between tourism and the enhancement and care of the landscape would benefit from further development		
Planning and Development	There is an increasing desire to retain character in the rural environment through the development of guidance on building design, pattern and scale		
	A number of town and parish councils have produced design guides and parish plans to act as an aid future development		
	The development of a Landscape Character Assessment can act as a supporting tool in the development control process and influence research into capacity and sensitivity for various forms of development		
	The tranquillity of the AONB is gradually being eroded through increased traffic, air transport and built development		
	The District Council's Countryside Service is developing		

²⁰ www.countryside.gov.uk/LAR/Access/coastal_access/index.asp

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	guidance on species and habitat management to facilitate appropriate development and biodiversity management.		
	The use of redundant farm buildings offers opportunities for diversification of the rural economy but it requires careful consideration in order to retain local distinctiveness and character		
	The development of new technologies and renewable energy is likely to materialise in the form of more domestic/local scale development in the AONB		
	Local Development Frameworks require local authorities to identify areas for the restoration or creation of new priority habitats ²¹		
Transport and Highways	There is a continual need for integrating transport services with tourism and recreation opportunities.	Transport	The increased size of farm machinery and heavy vehicles is impact on narrow country lanes
	The AONB has supported youth transport schemes through its Sustainable Development Fund	Cross cutting issues	The AONB partnership needs to establish mechanisms for engagement with highways agencies on the landscape impacts of road schemes and proposals
	Promotional materials for the AONB need to take into consideration sustainable transport opportunities		Transport and traffic data can provide useful indications of the changes in volume and impact of traffic in the area
	There is an increasing desire for the development of sustainable access routes to reduce the need for transport in and around towns and villages		Opportunities for the development of sustainable access routes to reduce the need for transport in and around towns and villages needs to be investigated

²¹ www.communities.gov.uk/documents/planningandbuilding/pdf/147408

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	The AONB Partnership needs to establish mechanisms for engagement with highway departments and agencies on the landscape impacts of road schemes and proposals		
Rural Economy and Services	Increasing interest in sustainable/organic farming, regionalised and branded foods, of quality niche markets and direct selling, for example, through farmers markets, do not hold all the answers but may provide a means of sustaining small family farmers in the region	Rural Regeneration	There is a need to strengthen the connections between the business sector, local markets and landscape management
	The evolution of communication systems and the desire to adopt more sustainable lifestyles offer opportunities for more flexible working patterns and employment opportunities in rural areas		There may be pressure for new and possibly larger farm buildings as a consequence of agricultural restructuring
	An East Devon AONB Food and Drinks guide has been produced and East Devon Farmers markets established in local market towns	Cross cutting issues	Landscape and Biodiversity issues need to be seen as a key part of regeneration and development programmes within the AONB
	A Rural Enterprise Development programme ²² to advise local businesses has been established by the district council in partnership with others		
	Designation of the Dorset and East Devon Coast World Heritage Site is bringing increased profile to the area, in particular for the tourism sector		
	Planning Policy Statement (PPS7) ²³ makes recommendations		

²² www.bipwestdevon.biz/funding.php#red

Draft Management Strategy Sub-theme	Key Environmental Forces for Change identified in the Management Strategy Consultation Draft 2008	2004-9 Management Strategy Theme	Key environmental issues identified in the 2004-2009 Management Plan and listed in the SEA Scoping Report
	that support the re-use of rural buildings encouraging business or community uses		
	There is a need to strengthen the connections between the business sector, local markets and landscape management.		
	There is a need to develop an integrated approach to business, planning and environmental support/advice within east Devon		
Community and Culture	The Parish Plans and the Market and Coastal Town Initiative ²⁴ have served to stimulate grass roots rural community and cultural initiatives		
	The LEADER + programme of local community action in the Blackdown Hills AONB could be replicated in East Devon AONB under the new ERDP ²⁵ programme		

²³ www.planningportal.gov.uk/england/professionals/en/1020432885091.html

²⁴ www.southwesttowns.net/

²⁵ www.southwestrda.org.uk/what-we-do/regeneration/eafrd/community-led-develo.shtm

Appendix 2. Assessment aiding questions

These questions are developed from the Forces for Change identified by the Management Plan Review process. They help to focus the decision-making process on whether and how a policy will have a significant impact on the environment and the achievement of the SEA Objectives.

	SEA Objective	Assessment questions. Does the policy..?
E1	To protect and enhance landscape	Protect key landscape features? Protect key views? Help maintain low (financial) return landscapes that have a high ecological and/or historic environment value?
E2	To protect and where practical enhance biodiversity (habitats)	Promote the protection and appropriate management of statutory sites such as SACs, SPAs, NNRs, SSSIs? Promote the protection or management of BAP habitats? Protect the Dorset and East Devon Coast World Heritage Site? Prevent damage to designated sites, such as SACs, SPAs, SSSIs and RIGS?
E3	To protect and enhance fauna and flora (individual species)	Support the protection of legally protected species and BAP species? Maintain species that are vulnerable to changing land management? Help species that are vulnerable to the impacts of climate change?
E4	To maintain cultural heritage (including architectural and archaeological heritage)	Promote cultural traditions, such as farmers markets, agricultural shows, village fetes etc.? Help protect the traditional village shop or pub? Promote traditional skills, such as hedgelaying, walling, building with lime mortar etc? Maintain historic environment features that are vulnerable to climate change? Maintain historic environment features that are vulnerable to changing land management?
E5	To protect material assets including natural resources	Reduce the consumption or degradation of natural resources? Promote recycling, and waste management? Assist Devon in recovering value from 45% of municipal waste by 2010? Protect tranquillity? Allow for adaptation to climate change impacts? Protect environmental features from flooding?

E6	To protect and enhance soil quality	Promote good/ sustainable soil management? Promote the restoration and maintenance of landscape features which aid soil management, e.g. by reducing run-off?
E7	To protect water, air and climate	Reduce diffuse pollution? Help achieve Water Quality Standards? Promote suitable renewable energy sources? Contribute to the UK target of reducing carbon emissions by 60% by 2050?
E8	To safeguard human health	Protect human health by raising local environmental quality? Protect human health by providing opportunities for physical exercise? Promote mental well-being for example by creating opportunities for quiet enjoyment of the countryside? Increase the quality of life of local communities?
E9	To ensure no adverse effect arises on population (i.e. demographic balance)	Disadvantage any particular sector of the community? Does it help vulnerable landscape management sectors adapt to economic and climate change?
E10	To avoid significant adverse effects between the above interrelationships	Prejudice the achievement of another SEA Objective? In combination with another policy, does it prejudice the achievement of any of the SEA Objectives?