



Exeter Plan: Publication Plan

Sustainability Appraisal Report

Exeter City Council

Final report

Prepared by LUC

December 2024

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Exeter Plan: Publication Plan

Contents

Chapter 1 **1**

Introduction

The Plan Area	1
The Exeter Plan	4
Sustainability Appraisal and Strategic Environmental Assessment	8
Meeting the Requirements of the SEA Regulations	10
Structure of the SA Report	16

Chapter 2 **18**

Methodology

SA Stage A: Scoping	20
SA Stage B: Developing and Refining Options and Assessing Effects	23
SA Stage C: Preparing the Sustainability Appraisal Report	27
SA Stage D: Consultation on the Exeter Plan and the SA Report	27
SA Stage E: Monitoring Implementation of the Local Plan	28
Appraisal Methodology	28
Difficulties and Data Limitations	30

Chapter 3 **34**

Sustainability Context

Relationship with Other Relevant Plans or Programmes	34
Policy Context	35
Baseline Information	57
Key Sustainability Issues	59
The SA Framework	66

Contents

Chapter 4 **76**

Sustainability Appraisal Findings for the Strategic Options

Chapter 5 **82**

Sustainability Appraisal Findings for the Site Options

Chapter 6 **106**

Sustainability Appraisal Findings for the Publication Plan

Objectives	107
Spatial Strategy	116
Climate Change	122
Homes	141
Economy and Jobs	168
Retail and the future of our Centres	178
Sustainable Transport and Communications	183
Natural Environment	200
History and Heritage	213
Culture and Tourism	221
High Quality Places and Design	224
Health and Wellbeing	230
Infrastructure and Facilities	234
Site Allocation Policies	242
Cumulative Effects	259
Duration of Effects	284
Recommendations	286

Contents

Chapter 7 **302**

Monitoring

Proposed SA monitoring framework for the Exeter Plan 303

Chapter 8 **312**

Conclusions

Next Steps 313

Appendix A **314**

Consultation Comments Received in Relation to Previous SA Documents

Appendix B **365**

Review of Relevant Plans, Policies and Programmes

Appendix C **411**

Baseline Information

Appendix D **484**

Site Assessment Criteria

Appendix E **503**

Council's Reasons for Selecting or Rejecting Site Options

References

519

Table of Tables

Table 2.1: Key to symbols and colour coding used in the SA	29
Table 4.1: Summary of SA findings for the Strategic Options	81
Table 5.1: Summary of SA findings for the Residential Site Options	94
Table 5.2: Summary of SA findings for the Mixed use Site Options	103
Table 5.3: Summary of SA Findings for the Employment Site Options	105
Table 6.1: Summary of SA findings for the Objectives	109
Table 6.2: Summary of SA findings for the Spatial Strategy Policies	116
Table 6.3: Summary of SA findings for the Climate Change Policies	124
Table 6.4: Summary of SA findings for the Homes Policies	143
Table 6.5: Summary of SA findings for the Economy and Jobs Policies	169
Table 6.6: Summary of SA findings for the Retail and the Future of our Centres Policies	179
Table 6.7: Summary of SA findings for the Sustainable Transport and Communications Policies	185
Table 6.8: Summary of SA findings for the Natural Environment Policies	201
Table 6.9: Summary of SA findings for the History and Heritage Policy	214
Table 6.10: Summary of SA findings for the Culture and tourism Policies	221
Table 6.11: Summary of SA findings for the High Quality Places and Design Policies	224
Table 6.12: Summary of SA findings for the Health and Wellbeing Policies	230
Table 6.13: Summary of SA findings for the Infrastructure and Facilities Policies	234
Table 6.14: Relationship between the Site allocation policies and site options	243
Table 6.15: Summary of SA findings for Site Allocation Policies	244
Table 6.16: Summary of SA findings for the Objectives, Policies and Site Allocations in the Publication Plan	260
Table 6.17: Summary of cumulative effects of the whole Publication Plan	283
Table C.1: Estimated populations by ward in Exeter City Council (2021)	411

Contents

Table C.2: Annual housing completions in Exeter City	413
Table C.3: Total net housing supply 2024/25 to 2028/29	415
Table C.4: Exeter likely new primary school provision required between 2016 and 2023	428
Table C.5: Deprivation ranking by district in England	429
Table C.6: Employee jobs by industry in Exeter (2022)	434
Table C.7: Natural England's SSSI Condition Assessment 2023	446
Table C.8: Heritage assets on Historic England's Heritage at Risk Register in Exeter	451
Table C.9: Projected changes in climate for the South West under the high emissions scenario (2018 State of the Environment Report)	458
Table C.10: Carbon dioxide emissions estimates in Exeter 2005-2022	460
Table C.11: Changes in carbon dioxide emissions by sector for Exeter between 2005 and 2022	461
Table C.12: Energy consumption in Exeter by type	463
Table E.1: Residential site options	504
Table E.2: Mixed use site options	514
Table E.3: Employment site options	518

Table of Figures

Figure 1.1: Location of Exeter City	3
Figure 2.1: Corresponding stages in plan-making and SA	19
Figure 3.1: Relationship between the Exeter Plan and other relevant plans or programme	35
Figure C.1: Green Infrastructure Investment Plan	424
Figure C.2: Recreation and access routes	426
Figure C.3: Distribution of deprivation	431
Figure C.4: Transport network	439
Figure C.5: Flows of commuters in and out of Exeter (total) (2011)	440
Figure C.6: Environmental designations	448
Figure C.7: Heritage assets	452
Figure C.8: National Character Areas	456
Figure C.9: Flood zones	466
Figure C.10: Air Quality Management Area	470

Contents

Figure C.11: Agricultural Land Classification	476
Figure C.12: Nitrate Vulnerable Zones	480

Chapter 1

Introduction

1.1 Exeter City Council commissioned LUC in February 2022 to carry out a Sustainability Appraisal (SA) of the emerging new Local Plan for Exeter City, known as the Exeter Plan. The Exeter Plan will set the planning framework for Exeter City between 2021 and 2041 and will set out policies and proposals to address housing needs and other economic, social and environmental issues. Once adopted, the Exeter Plan will replace the existing Core Strategy and the Local Plan (First Review). This SA report relates to the Publication Plan (December 2024) and it should be read in conjunction with that document.

The Plan Area

1.2 Exeter City lies within the county of Devon in the South West of England (see Figure 1.1) and covers an area of 4,788 hectares. It is a university city, bordered by the districts of East Devon, Teignbridge and Mid Devon. Exeter is located at the northern tip of the Exe Estuary, approximately 15km from the coast, and provides easy access to other areas such as Dartmoor. It has an estimated population of 137,050 [See reference 1] and is at the heart of a travel to work area of over 470,000 residents [See reference 2]. The city is one of three larger urban centres within the predominantly rural county of Devon and is served by major transport infrastructure including the M5 motorway, main railway lines, and Exeter Airport.

1.3 Exeter is a vibrant city with a young demographic. It has a compact centre with many places to shop, an impressive programme of events and a leisure offer that bring its public spaces to life, with an average city centre footfall of 3,818,35 people per month [See reference 3]. It is also a Fairtrade City and is one of the most successful locations for investment in the UK. It has an emerging tech industry, as well as strengths in environmental and life sciences. Some of Exeter's institutions and events are internationally important and

recognised. Its university is in the top tier internationally and the city is home to the Met Office. It also enjoys great success in sport, with the Exeter Chiefs being one of the country's leading Rugby Union teams. Working with Sport England as one of 12 national pilots, Exeter aims to be the most active city in the UK by creating an infrastructure that simultaneously reduces congestion and improves the health and wellbeing of its citizens.

Figure 1.1: Location of Exeter City



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Figure 1.1: Location of Exeter City

- Exeter City boundary
- Neighbouring authority

The Exeter Plan

1.4 Exeter City Council is preparing a new Local Plan which, once adopted, will replace the existing Core Strategy and the Local Plan (First Review). The new Local Plan is known as the Exeter Plan and it will set the planning framework for Exeter City between 2021 and 2041, setting out policies and proposals to address housing needs and other economic, social and environmental issues.

1.5 Exeter City Council consulted on a high level 'Issues' paper between September and November 2021. The Issues consultation explained what Exeter City Council believes are the main issues for the city. The consultation did not include any options or draft policies at that stage. Responses to the consultation were used to inform preparation of the Outline Draft Plan which was subject to public consultation between September and December 2022. The outcomes of that consultation in turn fed into the preparation of the Full Draft Plan, which was subject to consultation between October 2023 and January 2024. The outcomes of that consultation have now fed into the preparation of the current Publication version of the Exeter Plan.

Structure of the Publication Exeter Plan

1.6 The Publication Plan document sets out 11 overarching objectives which will support the delivery of the Vision which is set out in the separate Exeter City Council 2040 Vision Statement. There are 74 policies within the Publication Plan, which is structured as follows:

- Objectives
- Spatial Strategy
 - Policy S1: Spatial Strategy (Strategic Policy)
 - Policy S2: Liveable Exeter Principles (Strategic Policy)
- Climate Change
 - Policy CC1: Net Zero Exeter (Strategic Policy)

- Policy CC2: Renewable and Low Carbon Energy (Strategic Policy)
- Policy CC3: Local Energy Networks (Strategic Policy)
- Policy CC4: Ground-mounted Photovoltaic Arrays
- Policy CC5: Future Development Standards (Strategic Policy)
- Policy CC6: Embodied Carbon
- Policy CC7: Development that is Adaptive and resilient to Climate Change
- Policy CC8: Flood Risk (Strategic Policy)
- Policy CC9: Water Quantity and Quality
- Homes
 - Policy H1: Housing Requirement (Strategic Policy)
 - Policy H2: Housing Allocations and Windfalls (Strategic Policy)
 - Policy H3: Regeneration Opportunity Areas (Strategic Policy)
 - Policy H4: Affordable Housing (Strategic Policy)
 - Policy H5: Build to Rent
 - Policy H6: Co-living Housing
 - Policy H7: Custom and Self-build Housing
 - Policy H8: Homes for Older People
 - Policy H9: Supported Housing
 - Policy H10: Purpose Built Student Accommodation
 - Policy H11: Gypsy and traveller accommodation
 - Policy H12: Residential Conversions and Houses in Multiple Occupation
 - Policy H13: Loss of Residential Accommodation
 - Policy H14: Accessible Homes

- Policy H15: Housing Density and Size Mix (Strategic Policy)
- Policy H16: Residential Amenity and Healthy Homes
- Economy and Jobs
 - Policy EJ1: Economic Growth (Strategic Policy)
 - Policy EJ2: Retention of Employment Land (Strategic Policy)
 - Policy EJ3: New Forms of Employment Provision (Strategic Policy)
 - Policy EJ4: Access to Jobs and Skills
 - Policy EJ5: Provision of Local Services in Employment Areas
 - Policy EJ6: New Transformational Employment Allocations (Strategic Policy)
- Retail and the Future of our Centres
 - Policy RFC1: The Future of our Centres (Strategic Policy)
 - Policy RFC2: Development in, and affecting, our Centres (Strategic Policy)
- Sustainable Transport and Communication
 - Policy STC1: Sustainable Movement (Strategic Policy)
 - Policy STC2: The Transport Hierarchy (Strategic Policy)
 - Policy STC3: Supporting Active Travel (Strategic Policy)
 - Policy STC4: Supporting Public Transport (Strategic Policy)
 - Policy STC5: Supporting more Sustainable Forms of Car Use
 - Policy STC6: Travel Plans
 - Policy STC7: Safeguarding Transport Infrastructure (Strategic Policy)
 - Policy STC8: Motorway Service Area (Strategic Policy)
 - Policy STC9: Digital Communications (Strategic Policy)
- Natural Environment

- Policy NE1: Landscape Setting Areas (Strategic Policy)
- Policy NE2: Valley Parks (Strategic Policy)
- Policy NE3: Biodiversity (Strategic Policy)
- Policy NE4: Green Infrastructure (Strategic Policy)
- Policy NE5: Green Circle
- Policy NE6: Urban Greening Factor
- Policy NE7: Urban Tree Canopy Cover
- History and Heritage
 - Policy HH1: Conserving and Enhancing Heritage Assets (Strategic Policy)
 - Policy HH2: Conservation Areas
 - Policy HH3: Archaeology
 - Policy HH4: Heritage Assets and Climate Change
 - Policy HH5: Conserving and Enhancing Exeter City Walls
- Culture and Tourism
 - Policy C1: Protecting and Enhancing Cultural and Tourism Facilities (Strategic Policy)
 - Policy C2: Development and Cultural Provision (Strategic Policy)
- High Quality Places and Design
 - Policy D1: Design Principles (Strategic Policy)
 - Policy D2: Designing-out Crime
 - Policy D3: Advertisements
- Health and Wellbeing
 - Policy HW1: Health and Wellbeing (Strategic Policy)
 - Policy HW2: Environmental Quality, Pollution and Contaminated Land

■ Infrastructure and Facilities

- Policy IF1: Delivery of Infrastructure (Strategic Policy)
- Policy IF2: Viability (Strategic Policy)
- Policy IF3: Community Facilities (Strategic Policy)
- Policy IF4: Open Space, Play Areas, Allotments and Sport
- Policy IF5: New Cemetery Provision

■ Site Allocation Policies

- Strategic Mixed-use Brownfield Allocation: SBA1 - Water Lane (Strategic Policy)
- Strategic Mixed-use Brownfield Allocation: SBA2 - East Gate (Strategic Policy)
- Strategic Mixed-use Brownfield Allocation: SBA3 - Red Cow (Strategic Policy)
- Strategic Mixed-use Brownfield Allocation: SBA4 - Exe Bridges Retail Park (Strategic Policy)
- Strategic Mixed-use Brownfield Allocation: SBA5 - South Gate (Strategic Policy)
- TI1: Topsham Infrastructure Delivery Framework: Strategic Policy

Sustainability Appraisal and Strategic Environmental Assessment

1.7 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended) [\[See reference 4\]](#). The SEA Regulations remain in force post-Brexit and it is a legal

requirement for the Exeter Plan to be subject to SA and SEA throughout its preparation.

1.8 The Levelling Up and Regeneration Act (2023) received royal assent in October 2023 and sets out the direction for planning, making provisions to support the levelling-up agenda. As part of this, it seeks to streamline the planning process, including through a reform of existing EU-generated systems of SA/SEA, Habitats Regulations Assessment (HRA) and Environmental Impact Assessment (EIA), which will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'. However, secondary legislation is required to introduce the new regime and at present the requirement to undertake SEA remains in force. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Exeter Plan is prepared.

1.9 SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. SEA considers only the environmental effects of a plan, while SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate SEA should not be required. An approach which satisfies the requirements for both SA and SEA is advocated in the Government's Planning Practice Guidance (PPG) [\[See reference 5\]](#). Practitioners can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken by Exeter City Council. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.10 The SA process comprises a number of stages, as shown below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

Stage D: Consulting on the plan and the SA Report.

Stage E: Monitoring the significant effects of implementing the plan.

Meeting the Requirements of the SEA Regulations

1.11 The following section below signposts the relevant sections of this SA Report that are considered to meet the SEA Regulations requirements.

Meeting the requirements of the SEA Regulations

SEA Regulations Requirements

Environmental Report

1.12 Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible Authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:

- Implementing the plan or programme; and

- Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.

1.13 Regulation 12(1) and (2) and Schedule 2

■ **Covered in this Report?**

- This SA Report which has been produced to accompany consultation on the Publication Plan constitutes the 'environmental report'.

1.14 An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans and programmes.

■ **Covered in this Report?**

- Chapter 1, Chapter 3, Appendix B and Appendix C

1.15 The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

■ **Covered in this Report?**

- Chapter 1, Chapter 3, Appendix B and Appendix C

1.16 The environmental characteristics of areas likely to be significantly affected.

■ **Covered in this Report?**

- Chapter 1, Chapter 3, Appendix B and Appendix C

1.17 Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild bird and the Habitats Directive.

■ **Covered in this Report?**

- Chapter 1, Chapter 3, Appendix B and Appendix C

1.18 The environment protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

■ **Covered in this Report?**

- Chapter 1, Chapter 3, Appendix B and Appendix C

1.19 The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary cumulative and synergistic effects, on issues such as:

- Biodiversity;
- Population;
- Human health;
- Fauna;
- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage, including architectural and archaeological heritage;
- Landscape; and
- The interrelationship between the issues referred to in sub-paragraphs (a) to (l).

■ **Covered in this Report?**

- Chapter 4, Chapter 5 and Chapter 6

1.20 The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

■ **Covered in this Report?**

- Chapter 4, Chapter 5 and Chapter 6

1.21 An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

■ **Covered in this Report?**

- Chapter 2

1.22 A description of the measures envisaged concerning monitoring in accordance with Regulation 17.

■ **Covered in this Report?**

- Chapter 7

1.23 A non-technical summary of the information is provided under paragraphs 1 to 9.

■ **Covered in this Report?**

- A separate non-technical summary document has been prepared to accompany this report.

1.24 The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:

- Current knowledge and methods of assessment;
- The contents and level of detail in the plan or programme;
- The stage of the plan or programme in the decision-making process; and

- The extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

1.25 Regulation 12(3)

■ Covered in this Report?

- The Environmental Report at each stage of the SA will adhere to this requirement.

Consultation

1.26 When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies.

1.27 Regulation 12(5)

■ Covered in this Report?

- The SA Scoping Report was produced by LUC on behalf of Exeter City Council and consulted on between April and May 2022. The responses received are summarised in Appendix A.

1.28 Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.

1.29 Regulation 13

■ Covered in this Report?

- Consultation on the Outline Draft Plan took place between September and December 2022, accompanied by the SA Report. The responses received are summarised in Appendix A.

- Consultation on the Full Draft Plan document took place between October 2023 and January 2024. The responses received are summarised in Appendix A.
- Consultation on the Publication Plan is taking place between December 2024 and February 2025. The consultation document is accompanied by this SA Report.

1.30 Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.

1.31 Regulation 14

■ **Covered in this Report?**

- The Exeter Plan is not expected to have significant effects on other EU Member States.

Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)

- Provision of information on the decision:
- When the plan or programme is adopted, the public and any countries consulted under Regulation 14 must be informed and the following made available to those so informed:
 - The plan or programme as adopted;
 - A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

- The measures decided concerning monitoring.
- **Covered in this Report?**
 - To be addressed after the Exeter Plan is adopted.

Monitoring

1.32 The responsible Authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

1.33 Regulation 17(1)

- **Covered in this Report?**
 - Chapter 7 proposes indicators for monitoring the likely significant effects of the Exeter Plan.

Structure of the SA Report

1.34 This chapter has described the background to the production of the Exeter Plan and the requirement to undertake SA. The remainder of this SA Report is structured into the following sections:

- Chapter 2: Methodology describes the approach that is being taken to the SA of the Exeter Plan.
- Chapter 3: Sustainability Context describes the relationship between the Exeter Plan and other relevant plans, policies and programmes; summarises the social, economic and environmental characteristics of Exeter City, and identifies the key sustainability issues it faces.
- Chapter 4: Sustainability Appraisal Findings for the Strategic Options presents the SA findings for the strategic options that have been considered for the Exeter Plan.

- Chapter 5: Sustainability Appraisal Findings for the Site Options presents the SA findings for the reasonable alternative development site options that have been considered for allocation in the Exeter Plan.
- Chapter 6: Sustainability Appraisal Findings for the Publication Plan presents the SA findings for the policies in the Publication Plan (October 2024) and describes the likely cumulative effects of the Plan.
- Chapter 7: Monitoring suggests indicators for monitoring the potential sustainability effects of the Exeter Plan.
- Chapter 8: Conclusions presents the conclusions of the SA of the Publication Plan and describes the next steps to be undertaken.
- Appendix A: Consultation Comments Received in Relation to Previous SA Documents presents a record of the consultation comments received in relation to the SA Scoping Report (March 2022) and the SA Reports for the Outline Draft Plan (August 2022) and Full Draft Plan (October 2024) and explains how they have been addressed.
- Appendix B: Review of Relevant Plans, Policies and Programmes presents a review of international, national and local plans, policies and programmes of relevance to the SA.
- Appendix C: Baseline Information presents baseline information for Exeter City.
- Appendix D: Site Assessment Criteria presents the criteria that have been used to ensure consistency in the SA of the reasonable alternative site options.
- Appendix E: Council's Reasons for Selecting or Rejecting Site Options sets out the Council's reasons for decision making regarding which sites to include as allocations in the Exeter Plan.

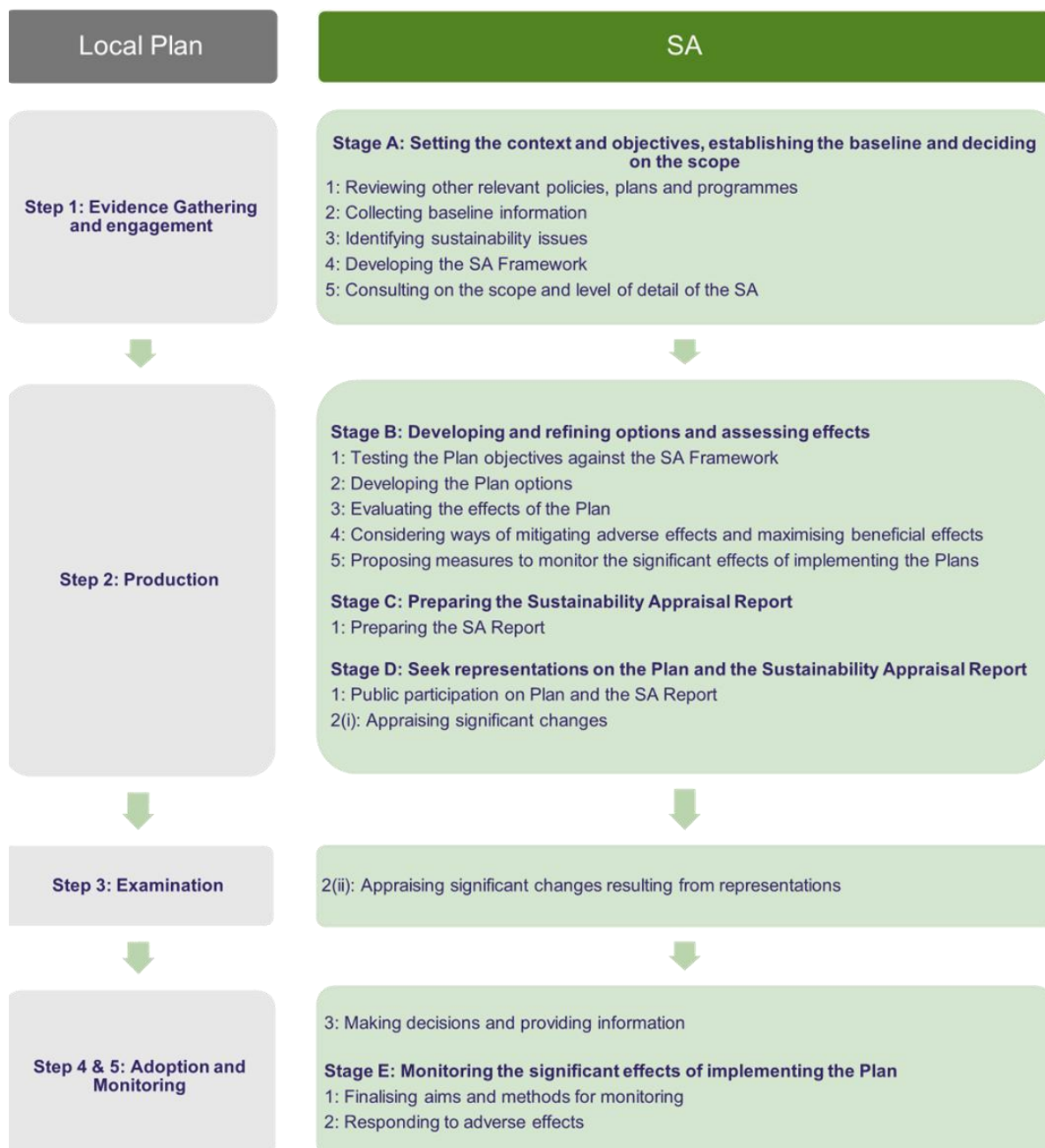
1.35 A separate Annex to the SA Report contains the detailed site appraisal proformas for the reasonable alternative development site options, due to their length.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Exeter Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG). This calls for SA to be carried out as an integral part of the plan-making process. Figure 2.1 overleaf sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Figure 2.1: Corresponding stages in plan-making and SA



2.2 The sections below describe the approach that has been taken to the SA of the Exeter Plan.

SA Stage A: Scoping

2.3 The Scoping stage of SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the appraisal framework as follows.

Review Other Relevant Policies, Plans and Programmes to Establish Policy Context

2.4 A Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support the attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

2.5 A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and sub-regional levels that were considered to be relevant to the scope of the Exeter Plan. This review was originally presented in the SA Scoping Report and was updated as part of the preparation of the SA Reports for the Outline Draft Plan (August 2022) and the Full Draft Plan (October 2023). It has again been reviewed and updated during the preparation of this SA report and the latest version is presented in full in Appendix B and is summarised in Chapter 3.

Collect Baseline Information to Establish Sustainability Context

2.6 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation.

2.7 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the plan to understand the likely future sustainability conditions in the absence of the plan.

2.8 The SEA Regulations require the Environmental Report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, allows the SA to report on the likely cumulative effects of the plan, which is another requirement of the SEA Regulations.

2.9 The SEA Regulations require an assessment of effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to these SEA topics as well as additional sustainability topics covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA and SEA processes. As part of the preparation of the SA Reports for the Outline Draft Plan (August 2022) and the Full Draft Plan (October 2023) the baseline information for Exeter City which was originally presented in the SA Scoping Report was reviewed and updated where possible (for example, some data from the 2021 Census had been published since the Scoping Report was prepared). The baseline information has again been reviewed and updated during the preparation of this SA report and is presented in Appendix C.

Identify Key Sustainability Issues

2.10 The baseline information allows for the identification of existing sustainability issues, including problems as required by the SEA Regulations.

2.11 Key sustainability issues facing Exeter City and an analysis of their likely evolution without the Exeter Plan are detailed in Chapter 3. Key sustainability issues for Exeter were originally identified in the SA Scoping Report and a small number of amendments have since been made to these in response to consultation comments received and updates to the baseline information.

Develop the SA Framework

2.12 The relevant sustainability objectives identified by the review of other policies, plans, and programmes, together with the key sustainability issues facing Exeter City identified by the collection and review of baseline information, helped to inform the development of a set of sustainability objectives (the ‘SA framework’) against which the effects of the Exeter Plan would be assessed.

2.13 Development of the SA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of options and policies within a plan.

2.14 The SA framework for the Exeter Plan is presented in Chapter 3. The SA objectives reflect the analysis of international, national and local policy objectives, the baseline information and the key sustainability issues identified for Exeter. The SA framework was originally presented in the Scoping Report and a small number of amendments were made to the framework as a result of consultation comments received.

Consult on the Scope and Level of Detail of the SA

2.15 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.16 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England, and Natural England) to be consulted “when deciding on the scope and level of detail of the information that must be included” in the SA Report. The scope and level of detail of the SA is governed by the SA framework. The consultation undertaken on the Scoping Report therefore incorporated consultation with the statutory consultees on the SA framework. This consultation on the SA Scoping Report was undertaken between April and May 2022.

2.17 Appendix A lists the comments that were received on the scope of the SA during this period of consultation and describes how each one was addressed in the preparation of the subsequent SA report. In light of the comments received, amendments were made to the monitoring framework (specifically SA Objective 12) and the SA Framework (specifically SA Objective 10).

SA Stage B: Developing and Refining Options and Assessing Effects

2.18 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other ‘reasonable alternatives’ to the options being considered for a plan.

2.19 In relation to the SA report, Part 3 of the SEA Regulations 12 (2) requires that:

“The report must 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.”

2.20 Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

“(h) an outline of the reasons for selecting the alternatives dealt with.”

2.21 The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are ‘reasonable’, therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF).

2.22 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan. The following sections outline how the reasonable alternative options for the Exeter Plan, the appraisals of which are presented in this report, have been identified.

Strategic Options

2.23 Exeter City Council identified and considered four alternative spatial approaches for the Exeter Plan. These were considered by the Council to be the reasonable alternative options for meeting the need for development identified over the plan period.

- Option A: Focus most development on large, strategic brownfield sites.
- Option B: Focus on developing greenfield sites.
- Option C: Dispersal on smaller sites.
- Option D: Focus on public transport hubs and routes within the city.

2.24 These options were originally appraised by LUC in June 2022 and the findings were provided to the Council in the form of an internal summary note, which was not made publicly available at the time, but which later formed the basis for Chapter 4 of the SA Report for the Outline Draft Plan. That appraisal work was repeated in the SA Report for the Full Draft Plan (October 2023) and is again presented in Chapter 4 of this current SA report. Providing the SA findings to the Council internally, before they were later published as part of the SA Report for the Outline Draft Plan, gave the Council the opportunity to take into account the SA findings, along with other relevant factors, when considering which option(s) to take forward in the Outline Draft Plan.

2.25 No reasonable alternative options for the amount of development have been considered in the SA as the Council is proposing an evidenced-based quantum of growth and does not consider that there are reasonable alternative options for higher or lower quanta. The evidence based Objectively Assessed Need (OAN) is considered by the Council to be the minimum amount of housing that should be required as there is land available to meet that need, so delivering less than that amount is not reasonable in SA terms. The Council believes that a higher housing figure is also not a reasonable option due to the restrictions of the administrative area both in terms of size and constraints.

Development Site Options

2.26 An initial series of site options was identified principally from a call for sites exercise undertaken by the Council in early 2021. These sites are presented alongside additional information in the Housing and Economic Land Availability Assessment (HELAA), which is published on the Exeter City Council website. Some sites initially submitted in the first Call for Sites were excluded from consideration by the Council on the basis that they were either no longer available or already known as undevelopable. Details of these are provided in the HELAA Report. The remainder of the site options, which were considered to be reasonable options, were subject to SA.

2.27 As with the strategic options, the reasonable alternative development site options were originally appraised by LUC in June 2022 and the findings were provided to the Council in the form of an internal summary note, which was not made publicly available at the time, but which later formed the basis for Chapter 5 of the SA Report for the Outline Draft Plan. This enabled the SA findings to be taken into consideration in the Council's decision making.

2.28 After consultation on the Outline Draft Plan, a further 17 reasonable alternative site options were identified as a result of further site submissions during the consultation and additional work undertaken by Council officers. These sites were subject to SA by LUC in June 2023 and the site appraisal work presented previously in Chapter 5 of the SA Report for the Outline Draft Plan was updated to incorporate these new sites alongside the original suite of options. That work was provided to the Council in early July 2023, so that it could be taken into account when preparing the Full Draft Plan and the updated site appraisal work was later presented in the SA Report for the Full Draft Plan (October 2023).

2.29 A second Call for Sites was carried out alongside consultation on the Full Draft Plan, which resulted in a further 31 reasonable site options being identified which included employment, Regeneration Opportunity Area and Gypsy and Traveller site options. These newly identified site options were subject to SA by LUC during Summer 2024 and an updated summary of the SA findings for all

site options was provided to the Council in June 2024 so that it could inform the preparation of the Publication plan. A number of additional amendments have since been made to the boundaries of some of the site options as well as some changes to proposed site uses and these have been reflected in the SA. In addition, some additional sites submitted in the first Call for Sites, and some sites submitted during consultation on the Outline Draft Plan, have since been excluded from consideration by the Council on the basis that they are currently being developed. These site options have therefore not been appraised within this SA Report. The up-to-date summary of the SA findings for all of the site options is now presented in Chapter 5 of this report.

SA Stage C: Preparing the Sustainability Appraisal Report

2.30 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Exeter Plan. It sets out the SA findings for the policy approaches and proposed site allocations in the Publication Plan, as well as the reasonable alternative options considered. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where relevant.

2.31 The SA findings are set out in Chapters 4 to 6 of this SA Report, along with recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the Exeter Plan.

SA Stage D: Consultation on the Exeter Plan and the SA Report

2.32 Information about consultation that has already taken place at earlier stages of plan-making has been provided above. Exeter City Council is now

inviting comments on the Publication Plan. This SA Report is being published on the Council's website at the same time as the Publication Plan, so that the two documents can be read in parallel. Comments received on this SA Report will be reviewed and considered prior to submission of the Exeter Plan for Examination.

SA Stage E: Monitoring Implementation of the Local Plan

2.33 Proposed indicators for monitoring the likely significant social, environmental and economic effects of implementing the Exeter Plan are included in Chapter 7 of this SA Report.

Appraisal Methodology

2.34 Reasonable alternative options for the policies and site allocations to be included in the Exeter Plan have been appraised against the SA objectives in the SA framework (see Table 3.2 in Chapter 3), with symbols being attributed to each option to indicate its likely effect on each SA objective as shown in Table 2.1. Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? Or -?) and the symbol was colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

2.35 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in Table 2.1. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude

that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

Table 2.1: Key to symbols and colour coding used in the SA

Symbol and Colour Coding	Description
++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effects likely.
+	Minor positive effect likely.
+/-	Mixed minor effects likely.
++/--	Mixed significant effects likely.
-	Minor negative effect likely.
--/+	Mixed significant negative and minor positive effects likely.
--	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

The Use of Site Assessment Criteria and Uncertainty

2.36 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, detailed sets of site assessment criteria were developed and applied. The criteria relate specifically to each type of site option (i.e. residential, mixed-use and employment sites) and set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from

features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The criteria are presented in Appendix D. They were applied mainly through the use of Geographical Information Systems (GIS) data.

Difficulties and Data Limitations

2.37 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

2.38 A number of difficulties and limitations arose in the course of the SA, as follows:

- There was a need to appraise a large number of site options consistently. In order to address this issue, detailed site assessment criteria relating to each of the SA objectives were developed and applied during the appraisal of site options (as described above).
- There is limited information on up to date business stock levels, and retail occupancy and vacancy rates.
- The housing stock data is based on Exeter Housing Market Area Strategic Housing Market Assessment 2014/15.
- The Green Infrastructure Study was undertaken in 2009 and is currently out of date.
- Apart from sampling point data [\[See reference 6\]](#); an up-to-date summary of water quality for Exeter, particularly for the River Exe, has not been found.

- The site assessment criteria presented in Appendix D of this SA report include a number of distance-based criteria used to estimate likely effects of site options. Research by the Institute of Highways and Transportation was used to identify desirable, acceptable and preferred maximum walking distances to various services and facilities. Distances in the appraisal were measured as a straight line distance from the edge of the site option to the features in question – examination of actual distances via the rights of way network was not possible since digital data were not available to indicate the access points of services and facilities or the likely entry and exit points from the site options. In addition, straight line distances do not allow for the consideration of physical barriers that may restrict access to features. Physical barriers could include rivers or motorways such as the River Exe and key highway routes. However, where possible the availability of crossings and bridges is taken into consideration to ensure that the features are accessible. Therefore, actual walking distances could be greater. To recognise the potential for walking distances to be greater, when applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances. A 10% buffer was applied to account for the potential difference between the straight line distance and the actual distance involved in a journey.
- Similarly, straight line distances were used to define areas within which varying levels of harm to certain environmental receptors were assumed to exist. In reality, the risk of harmful effects will sometimes depend on non-linear pathways (such as watercourses for water pollution effects) and will depend on the particular vulnerabilities of specific receptors. Nevertheless, the assumptions used were judged proportionate to the level of detail of a Local Plan and were considered to provide a consistent basis for assessing all of the site options. Note that not all SA objectives were assessed on the basis of proximity, e.g. for SA Objective 12: Cultural Heritage the results of a Heritage Impact Assessment were used instead of a distance based approach.
- Where site options are close to the Exeter City boundary, the spatial analysis was potentially affected by the fact that some spatial data required for proximity-based assessments were not available for neighbouring districts, or for part of them.

- The level of detail of the site options appraisal work was commensurate with the level of detail of the Exeter Plan document. As such, not every local characteristic could be investigated for each site option. For example, in relation to potential effects of the site options on biodiversity assets, it was necessary to base the identified effect on proximity to designated biodiversity sites only. While it is recognised that in some cases sites might be close to high value non-designated assets, the strategic nature of the SA meant that it was not possible to investigate this potential for each site option and the likely effect was based on designated sites only. This approach was considered to be the best way of ensuring consistency and a comparable level of detail in each site appraisal.
- The rate at which emissions from private vehicles will change over the course of the plan period as a result of technological improvements cannot be predicted or realistically factored into judgements about air quality and carbon emissions.
- The available GIS data for agricultural land classification did not distinguish between Grade 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land). This resulted in some uncertainty in the effects identified, as set out in the assumptions (see Appendix D).
- It became apparent during the site appraisal work carried out in 2023 that a small number of site options were being shown by the GIS data as overlapping open space/sports facilities; 20% most deprived areas and/or green infrastructure, whereas in reality they are adjacent. Minor inaccuracies within the GIS datasets lead to them showing as very slightly overlapping. The addition of a 5% buffer within the site appraisal criteria means that only sites where there is a genuine overlap are now shown as overlapping in the SA. This has resulted in some changes to the SA findings against SA Objectives 4, 6 and 10 for some site options that were already assessed at the first stage of the SA.
- It also became apparent from consultation comments that some areas of open space within the GIS dataset are not as easily accessible to the general public as others. This includes golf courses, rugby/football clubs and school grounds. In addition, the GIS dataset on open spaces contained cemeteries and religious ground which are not considered areas

for recreation. Therefore, a manual check against the GIS data on open space was carried out to ensure that any such features were considered appropriately in the context of their actual health and recreation benefits.

- Engagement with Natural England's National Planning Delivery Team in July 2024 led to the conclusion that the SSSI IRZs dataset is not appropriate for use in SA. The dataset has been designed for use at the planning application stage and on a site-by-site basis, rather than for strategic-level assessment such as SA. In any case, recent updates to the dataset have rendered it unsuitable for use in this type of GIS analysis as it no longer includes data attributes in the shapefiles (instead loading a webpage where relevant criteria are listed). Therefore, the site appraisal criteria in Appendix C have been amended and no longer draw on IRZ data. The full suite of reasonable alternative site options has been appraised in line with the new criterion and the findings are reported in Chapter 5.

Chapter 3

Sustainability Context

3.1 Schedule 2 of the SEA Regulations requires information on the following (numbering relates to the specific numbered list in Schedule 2):

1. “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes”; and
5. “the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”.

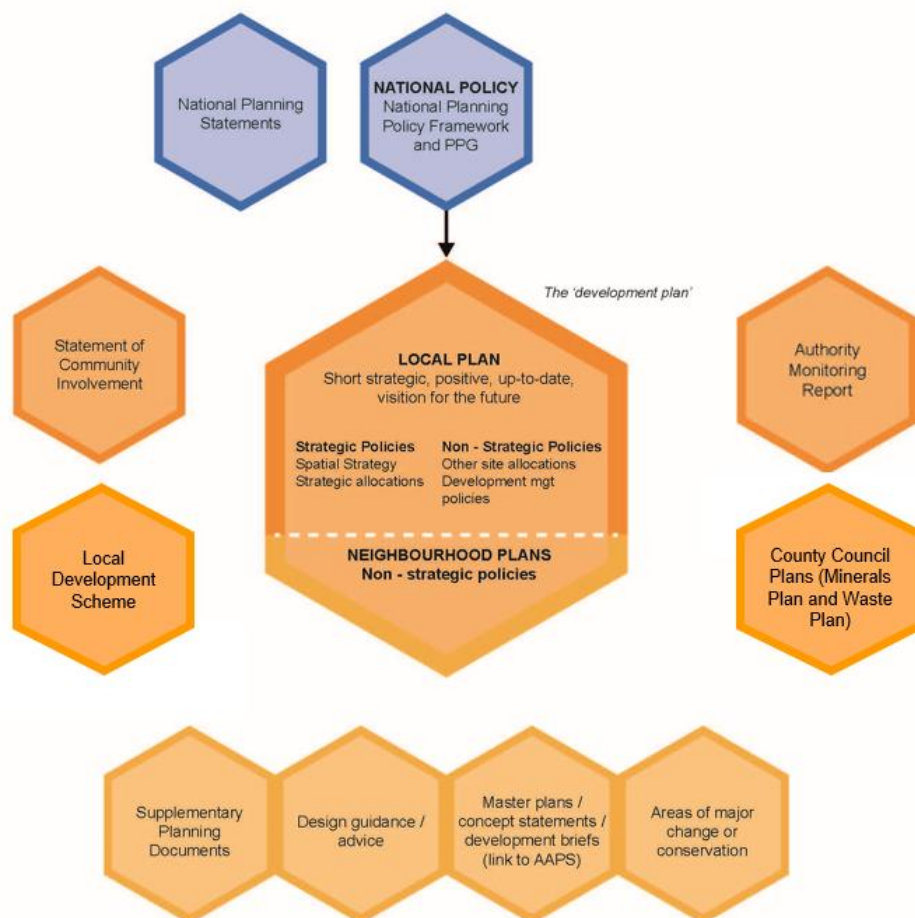
3.2 A description of the Publication Plan consultation document was provided in Chapter 1. The other reporting requirements are met in this chapter.

Relationship with Other Relevant Plans or Programmes

3.3 The Exeter Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as shown below in Figure 3.1. The Exeter Plan will replace the existing Core Strategy and the Local Plan (First Review). The Local Development Plan for the City also comprises any ‘made’ Neighbourhood Plans within Exeter and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents, also shown in Figure 3.1. For Exeter, this encompasses

the Exeter Local Plan First Review 1995-2011, The Core Strategy DPD to 2026, the Devon Minerals Plan 2011-2033 and the St. James' Neighbourhood Plan.

Figure 3.1: Relationship between the Exeter Plan and other relevant plans or programme



Policy Context

3.4 The policy context in which the Exeter Plan is being prepared informs consideration of what constitute reasonable alternative policy options for that document as well as the framework of sustainability objectives against which it will be appraised. It should be noted that the policy context is inherently

uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- **Brexit** – Following the UK's departure from the European Union on 31 January 2020, it entered a transition period which ended on 31 December 2020. From January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Relevant EU legislation has still been referred to in this report but will be removed as and when UK legislation is amended.
- **Levelling Up and Regeneration Act** – The Act sets out various planning reforms including the replacement of the SA/SEA regime with 'Environmental Outcomes Reports'; replacement of the CIL process and much of the section 106 payments system with a new national infrastructure levy; a shared framework of National Development Management Policies, removing much of this detail from Local Plans; replacement of supplementary planning documents (SPD) with Supplementary Plans that carry more weight and but would be subject to examination; repeal of the Duty to Cooperate; a duty on public bodies and infrastructure providers to assist the local plan-making process; a speeded up plan-making process (plans to be prepared and adopted within 30 months); a strengthened role for the 'national model design code'; replacement of Neighbourhood Plans with Neighbourhood Priorities Statements; removal of the current NPPF requirement to demonstrate a rolling five-year supply of housing land, provided that the local plan is up to date; removal of the 'soundness test' for local plans to be 'justified'. However, the change in Government could affect how the Levelling Up and Regeneration Act is implemented.
- **Planning and Infrastructure Bill** – The Bill is to be published in early 2025, aiming to accelerate the delivery of high-quality infrastructure and housing.
- Consultation was recently undertaken (July 2024 to September 2024) on proposed reforms to National Planning Framework. Some of the key reforms include a new standard method for assessing housing needs, release of grey belt land, improvements to developer contributions, supporting the green energy sector and changes to planning application fees. The Government is looking to publish responses to the consultation on the reformed NPPF by the end of 2024.

3.5 It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Exeter City Council, that have declared a climate emergency.

International

3.6 Former EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') were transposed into the Strategic Environmental Assessment (SEA) Regulations [\[See reference 7\]](#) and Habitats Regulations [\[See reference 8\]](#). Following the UK's departure from the EU, these Regulations still apply and require environmental assessment processes to be undertaken in relation to the Exeter Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

3.7 There were also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which are transposed into UK law through Acts, Regulations and national-level policy. The UK has now fully left the EU and therefore EU Directives no longer apply to the UK. The relevant Regulations are summarised in Appendix B.

National

3.8 There is an extensive range of national policies, plans and programmes that are of relevance to the Exeter Plan and the SA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the NPPF and PPG of

relevance to the Exeter Plan and the SA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance to the Exeter Plan and the SA are summarised in Appendix B.

The National Planning Policy Framework and Planning Practice Guidance

3.9 The NPPF [See reference 9] is the overarching planning framework which provides national planning policy and principles for the planning system in England. The NPPF was originally published in March 2012 and has been revised several times since, with the most recent version being published in December 2023. As noted above, an update to the NPPF is expected imminently following the recent consultation – however until such time as the updates are formally published, the 2023 NPPF is the applicable version and is referred to in this report. The Exeter Plan has been prepared under the December 2023 NPPF.

3.10 Since the updates that were made in 2021, the NPPF places an increased focus on design quality. This includes for sites as well as for places as a whole. The terminology included in the Framework on protecting and enhancing the environment and promoting a sustainable pattern of development has been revised. Furthermore, revisions are included in relation to policies which address opting out of permitted development, the use of masterplans and design codes and the important contribution of trees in new developments.

3.11 The NPPF has been revised to include amendments to urban uplift and Green Belt. Further revisions also include allowing flexibility for local authorities in relation to local housing need; safeguarding local plans from densities that would be out of character; freeing local authorities with up-to-date local plans from annual updates to their five-year housing land supply; and continued support for self-build, custom-build and community-led housing. The latest NPPF also emphasises the role of beauty and placemaking in the planning system.

3.12 The three overarching objectives of the planning system are set out in paragraph 8 of the 2023 NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- “an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- an environmental objective – to protect and enhance the natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

3.13 The Exeter Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.14 A local planning authority is also required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan [\[See reference 10\]](#).

3.15 Paragraph 20 of the 2023 NPPF states the need for strategic policies in plan making, which set out the overall strategy for the pattern, scale and design quality of places, making sufficient provision for:

- “a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

3.16 The PPG [\[See reference 11\]](#) provides guidance for how the Government’s planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

3.17 The overarching nature of the NPPF means that its implications for the SA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its implications for the plan making process and the SA is provided in more detail below.

3.18 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience;

encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure". Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

3.19 Section 19 of the Planning and Compulsory Purchase Act 2004 states how development plan documents must include policies designed to secure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change.

3.20 The SA can consider the contribution the alternatives make in terms of their contribution to climate change mitigation as well as climate change adaptation. The SA can also facilitate the delivery of climate resilient places.

3.21 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets.

3.22 The Future Homes Standard is set to come into effect in 2025, with the aiming of ensuring that new homes built from 2025 onwards will produce 75-80% fewer carbon emissions. For non-residential uses BREEAM assessments or other similar assessments can be used by local authorities to ensure buildings meet sustainability objectives. The SA can consider the contribution the alternatives make in terms of contribution to climate change mitigation as well as climate change adaptation.

3.23 In relation to health and wellbeing, the NPPF promotes healthy, inclusive and safe places which promote social integration, as well as enable and support

healthy lifestyles. The Building for a Healthy Life design toolkit [\[See reference 12\]](#) can be used by local authorities to assist in the creation of places that are better for people and nature.

3.24 One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. It is identified in the document that “a network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local Plans should also “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. Additionally, larger scale developments such as new settlements or significant extensions to existing villages and towns are required by the NPPF to be guided by policies set within a vision that looks at least 30 years ahead [\[See reference 13\]](#). The need for policies to be reflective of this longer time period is to take account of the likely timescale for delivery.

3.25 The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The Exeter Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Exeter Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The SA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy approaches that cumulatively improve the wellbeing of local communities.

3.26 The NPPF sets out the approach Local Plans should have in relation to biodiversity, stating that Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas

identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green and blue infrastructure is to be supported through planning policies.

3.27 The Exeter Plan, through its review of the spatial strategy, should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of approaches which are supportive of enhancing the connectivity of green and blue infrastructure and promoting the achievement of biodiversity net gain. The SA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

3.28 In relation to landscape, the NPPF sets the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty, now referred to as National Landscapes. The NPPF also acknowledges the role of heritage in helping to define landscape character.

3.29 The Exeter Plan should be supportive of an approach to development which would protect the landscape character of the City. The SA should identify those alternatives which contribute positively to landscape character.

3.30 The NPPF states that in relation to the historic environment plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution

the historic environment can make to the character of a place. The NPPF places a focus on making 'beautiful' and 'sustainable' places. The use of plans, design policy, guidance and codes is encouraged. The SA provides an opportunity to test alternatives in terms of the contribution they can make to the protection and enhancement of the historic environment.

3.31 The Exeter Plan can take forward a spatial strategy which helps to limit adverse impacts on designated and non-designated heritage assets, including any potential archaeological finds in line with heritage protection and enhancement plans. The SA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

3.32 The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollutions including water pollution and air quality. Inappropriate development in areas at risk of flooding should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient infrastructure provision for water supply and wastewater.

3.33 The Exeter Plan provides an opportunity to boldly pursue climate change mitigation and adaptation. It also provides an opportunity for improving the quality of air, a goal that is applicable to both urban and natural environments. It should be noted that the impact of air quality on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites is investigated separately through the Habitats Regulations Assessment (HRA).

3.34 The Exeter Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Exeter Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The SA process should

seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.

3.35 The NPPF states that planning system should protect and enhance soils in a manner commensurate with their statutory status or quality, while also encouraging the reuse of previously developed land.

3.36 Plans can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this, plans should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The SA process should inform the development of the Exeter Plan by helping to identify alternatives which would avoid the areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

3.37 The Framework sets out that in terms of economic growth the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.

3.38 Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. Local Plans are required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration”.

3.39 The Exeter Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies, through the review of the spatial strategy. Ensuring that local town centres and services and facilities at settlements in the

plan area are maintained and enhanced is also important and will also provide support for local communities. The SA process can support the development of the Exeter Plan to ensure that its policies are considerate of impacts on the economy in the City. The process can also be used to demonstrate that impacts on the viability of town centres in the area and surrounding areas have been considered.

3.40 The NPPF encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The NPPF also states that the planning system should actively manage growth patterns in support of these objectives.

3.41 Growth will inevitably increase traffic on the roads which also has implications for air quality, and the Local Plan and SA process can seek to minimise effects of this nature through an appropriate spatial strategy, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Exeter Plan, as supported by the SA, should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

Other National Policies, Plans and Programmes

3.42 Numerous other policies, plans and programmes at the national level are of relevance to preparation of the Exeter Plan and the SA. Unlike the NPPF, most of the documents focus on a specific topic area which the SA will consider. There will be some overlap between SA topics covered by these plans and programmes where those documents contain more overarching objectives.

However, the plans and programmes considered to be of most relevance for the SA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the national PPPs (including the NPPF) for the Exeter Plan and SA.

Climate Change Adaption and Mitigation, Energy Efficiency and Waste Minimisation

3.43 The relevant national PPPs under this topic are:

- The Third National Adaptation Programme (NAP3) (2023)
- The Biomass Strategy (2023)
- Carbon Budget Delivery Plan (2023)
- Powering up Britain (2023)
- The Environment Improvement Plan (2023)
- British Energy Security Strategy (2022)
- UK Climate Change Risk Assessment (2022)
- The Environment Act (2021)
- Net Zero Strategy: Build Back Greener (2021)
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020)
- 25 Year Environment Plan (2018)
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018)
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018)
- UK Climate Change Risk Assessment (2017)

- HM Government, The Clean Growth Strategy (2017)
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014)
- Defra, Waste Management Plan for England (2013)
- The Energy Efficiency Strategy (2012)
- National Flood and Coastal Erosion Risk Management Strategy for England (2020)
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)
- The UK Renewable Energy Strategy (2009)

Implications for the Exeter Plan and SA

The Exeter Plan should consider setting out policies to achieve climate change mitigation and adaptation while also encouraging development which would help to minimise carbon emissions. This can be done through siting development allocations in areas where sustainable transport patterns can be best achieved and encouraging development to make use of more sustainable sources of energy. The Exeter Plan should also contain policies to encourage appropriate use of SuDS and handling of waste in line with the waste hierarchy.

The SA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and Wellbeing

3.44 The relevant national PPPs under this topic are:

- The Levelling-up and Regeneration Act,
- Green Infrastructure Framework (2023)
- White Paper Levelling Up the United Kingdom (2022)
- A fairer private rented sector White Paper (2022)
- National Design Guide (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- COVID-19 mental health and wellbeing recovery action plan (2021)
- Using the planning system to promote healthy weight environments (2020), Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Planning for the Future White Paper (2020)
- Homes England Strategic Plan 2018 to 2023 (2018)
- Planning Policy for Traveller Sites (2015)
- Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015)
- Fair Society, Healthy Lives (2011)
- Public Health England, PHE Strategy 2020-25
- HM Government, Laying the foundations: housing strategy for England (2011)

Implications for the Exeter Plan and SA

The Exeter Plan needs to consider the need for infrastructure as this has a significant impact on the environment and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space. Development allocations should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies in the Exeter Plan can also help to facilitate the supply of healthy local food. The provision of an appropriate level of housing over the plan period will help address issues of disparity in terms of access to decent housing in the plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Travellers.

Policy options considered for the Exeter Plan can be tested through the SA in relation to the contributions they make towards these aims. The SA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the site's ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. It may be necessary to consider the capacity of existing facilities when considering individual site options. Consideration should also be given to the capacity of sites to deliver new homes, including affordable homes.

Environment (biodiversity/geodiversity, landscape and soils)

3.45 The relevant national PPPs under this topic are:

- The Environment Improvement Plan (2023)
- Working with Nature (2022)
- Establishing the Best Available Techniques for the UK (UK BAT) (2022)
- The Environment Act 2021
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- Defra, Biodiversity offsetting in England Green Paper (2013)
- Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- Defra, Safeguarding our Soils – A Strategy for England (2009)
- England Biodiversity Strategy Climate Change Adaptation Principles (2008)

Implications for the Exeter Plan and SA

The Exeter Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The plan area contains internationally and nationally important biodiversity sites which will need to be protected through planning policy. The plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of the wider ecological network. The plan also presents opportunities to promote the achievement of net gain in biodiversity. It can also be used to

encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. The allocation of new sites for development and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be the role of the SA to test the policy options effect on biodiversity sites and habitats as well as valued landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also, making use of the findings of the HRA and landscape character assessment work where appropriate.

Historic Environment

3.46 The relevant national PPPs under this topic are:

- Historic England Corporate Plan (2022-23)
- The Heritage Alliance, Heritage 2020
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016)

Implications for the Exeter Plan and SA

The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings, should also inform the preparation of the Exeter Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the

national and local level). Policies should be included to address these issues and site options should be considered with regard to the potential for related issues. The Exeter Plan also has a role in encouraging growth, development and infrastructure that has positive effects or enhances the historic environment, including people's access, understanding and enjoyment of it.

The SA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment, as informed by heritage impact assessment work for the Exeter Plan.

Water and Air

3.47 The relevant national PPPs under this topic are:

- National Chalk Streams Strategy Chalk Stream Strategy (2021)
- Managing Water Abstraction (2021)
- Meeting our future water needs: a national framework for water resources (2020)
- The Waste (Circular Economy) (Amendment) Regulations (2020)
- Defra, Clean Air Strategy (2019)
- The Road to Zero (2018)
- Our Waste, Our Resources: A strategy for England (2018)
- The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)
- Defra, Water White Paper (2012)

- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)

Implications for the Exeter Plan and SA

The Exeter Plan should consider setting out policies to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the plan period, the Exeter Plan should also factor in the contribution that specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution that policy options can make to achieving these aims can be tested through the SA.

Economic Growth

3.48 The relevant national PPPs under this topic are:

- The Growth Plan (2022)
- Build Back Better: Our Plan for Growth (2021)
- Agricultural Transition Plan 2021 to 2024
- Agriculture Act 2020
- UK Industrial Strategy: Building a Britain fit for the future (2018)
- Industrial Strategy: building a Britain fit for the future (2017)

- LEP Network response to the Industrial Strategy Green Paper Consultation (2017)
- National Infrastructure Delivery Plan 2016-2021 (2016)
- National Infrastructure Delivery Plan 2016-2021

Implications for the Exeter Plan and SA

The Exeter Plan should allocate land to support the projected level of economic growth required over the plan period. Exeter Plan policies should be included to help promote sustainable economic and employment growth to benefit all members of the community as to reduce disparity in the plan area. This should include support for the infrastructure required for the economy to function successfully. Local economic growth should be considered in the light of wider economic growth of the local LEPs. Employment sites should be located to enable local people to be able to access the new employment opportunities. Exeter Plan policies may also seek to promote the viability of the City Centre as well as Local Centres.

The SA can test individual site and policy options in relation to the contribution they can make to achieving these aims. Employment site options should be appraised in terms of the contribution they can make to meeting the employment land requirements of the City as well as the access residents would have to the employment opportunities delivered.

Transport

3.49 The relevant national PPPs under this topic are:

- Future of Transport: supporting rural transport innovation (2023)

- Cycling and Walking Investment Strategy Report to Parliament (2022)
- Decarbonising Transport: A Better, Greener Britain (2021)
- Decarbonising Transport: Setting the Challenge (2020)
- Department for Transport, The Road to Zero (2018)
- Transport Investment Strategy (2017)
- Highways England Sustainable Development Strategy and Action Plan (2017)

Implications for the Exeter Plan and SA

The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the Local Plan and its site allocations. The Exeter Plan can also be supportive of more sustainable modes of transport. This may include support for the infrastructure necessary for electric vehicles. Furthermore, the selection of site options for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes and specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

The SA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the City. As well as testing site options in terms of limiting the need to travel in Exeter, policy options should be tested with regard to the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Sub National

3.50 Below the national level there are further plans and programmes which are of relevance to the Exeter Plan and the SA process. These plans and programmes sit mostly at the sub-regional, county and district levels. Details of those plans and programmes which are of most relevance at this level are provided in Appendix B.

Surrounding Development Plans

3.51 Development in Exeter will not be delivered in isolation from those areas around it. Given the interconnection between Exeter and the surrounding areas there is potential for cross-boundary and in-combination effects where development is proposed through development plans in neighbouring authorities. As such, a summary of the following plans for local authority areas which surround the City is also provided in Appendix B:

- East Devon Local Plan 2013 to 2031 (2016);
- Mid Devon Local Plan 2013 to 2033 (2020); and
- Teignbridge Local Plan 2013 to 2033 (2014).

3.52 Appendix B also includes a summary of the regional transport, minerals and waste plans which, together with the relevant Local Plan documents, comprise the development plans for these authorities.

Baseline Information

3.53 Baseline information provides the context for assessing the sustainability of proposals in the Exeter Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. Baseline data must be relevant to environmental, social and economic issues, be

sensitive to change and should ideally relate to records that are sufficient to identify trends.

3.54 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

(3) The environmental characteristics of areas likely to be significantly affected.”

3.55 Schedule 2(6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these. As an integrated SA and SEA is being carried out, baseline information relating to other ‘sustainability’ topics has also been included, for example, information about housing, social inclusiveness, transport, energy, waste and economic growth.

3.56 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan’s effects can be assessed in the SA and monitored during the plan’s implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Exeter Plan to understand the likely future sustainability conditions in the absence of the local plan.

3.57 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline, or reports not yet published, these are highlighted in the text. The collection and

analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data are published.

3.58 The baseline information for Exeter City is presented in Appendix C.

Key Sustainability Issues

3.59 Key sustainability issues for Exeter City were originally identified in the SA Scoping Report (March 2022). These issues were reviewed in light of the Scoping consultation responses received and are summarised in the following section.

3.60 It is also a requirement of the SEA Regulations that consideration is given to the likely evolution of the environment in the plan area (in this case Exeter City) if the Exeter Plan was not to be implemented. This analysis is also presented in the final section in relation to each of the key sustainability issues.

Key sustainability issues for Exeter City and their likely evolution in the absence of the Exeter Plan

Population, Health and Wellbeing

■ Key Sustainability Issue

- Housing is a big issue, particularly with the housing market in Exeter being expensive and residents struggling to afford homes. There is a current imbalance between the supply and demand resulting in a lack

of affordability of homes. There is a need for a mix of housing types that cater for the needs of a range of people.

- There is also an increasing need for primary and special needs provision and secondary education in future years due to a significant increase in births and migration into the City in recent years.
- There are inequalities related to life expectancy and overall deprivation within Exeter which could be exacerbated by the ongoing impact of COVID-19 pandemic.
- Likely Evolution of the Issue without the Exeter Plan
 - The required housing is less likely to be delivered and/or be delivered in less sustainable locations. The required mix of housing is less likely to be delivered. Continued population growth and demographic change will place additional demand on key services and facilities such as housing, health and education. The new Exeter Plan offers an opportunity to manage these pressures.
 - The new Exeter Plan provides opportunity to help manage pressures on education facilities by setting clear requirements for the provision required for new development.

Open Spaces and Recreation

- Key Sustainability Issue
 - Exeter is well provided with open space but it could be better utilised to meet the needs of the City, with some facilities benefiting from improvement, and there being a potential need for increased provision of sports pitches and improving people's access to nature.
- Likely Evolution of the Issue without the Exeter Plan
 - The new Exeter Plan and related transformational housing delivery initiative (Liveable Exeter) provide the opportunity to ensure great open spaces and recreation provision, providing opportunities to promote healthy lifestyles, social cohesion and benefits for mental health and

well-being. In the absence of the Plan such opportunities would be more limited and the issue is more likely to continue.

Crime and Safety

■ Key Sustainability Issue

- Crime and safety can be a concern in Exeter, as its current crime rates compare poorly to the rest of Devon. However, crime rates have not worsened in recent years.

■ Likely Evolution of the Issue without the Exeter Plan

- The new Exeter Plan is unlikely to directly affect levels of crime but providing development opportunities that are well designed, generate jobs, affordable housing and community facilities may help address some of the causes of crime.

Economy

■ Key Sustainability Issue

- Exeter has a low business density due to a dominance of larger employers.
- Uncertainty exists over what the economic impacts of macro-economic issues related to the war in Ukraine and the recent economic downturn.

■ Likely Evolution of the Issue without the Exeter Plan

- The new Exeter Plan can help support the strong economy and continued growth, and new businesses, by identifying the employment sites and infrastructure the City requires.
- The new Exeter Plan offers an opportunity to build a land use strategy that is sufficiently flexible to respond to these uncertainties through a mix of development types. In the absence of the Plan it is less likely that this issue will be effectively addressed and the economy may not be as effectively strengthened and grown.

Transport

■ Key Sustainability Issue

- Exeter continues to see significant levels of inward commuting, with travel behaviour for commuters outside the City predominantly being by car.

■ Likely Evolution of the Issue without the Exeter Plan

- The new Exeter Plan could help support an increasing shift towards the use of sustainable modes of travel by ensuring development and regeneration schemes are supported by sustainable infrastructure and that amenities, services and jobs are located within a reasonable walking and cycling distance. In the absence of the Plan it is more likely that there would be a continued focus on car use, although it is likely that changes in technology would mean more electric cars are in use even without the Plan. However, Exeter City relies on cross boundary transport across Devon with Devon County Council being the Local Transport Authority.

Biodiversity

■ Key Sustainability Issue

- There is a risk of Exeter's sensitive biodiversity sites being harmed by inappropriate development, increased activity and increased urbanisation impacts.

■ Likely Evolution of the Issue without the Exeter Plan

- The new Exeter Plan provides an opportunity to manage development pressures on these sites, and to evaluate the condition of the habitats and employ measures to ensure that future growth in the City does not adversely affect their current condition but where possible contributes to their restoration and enhancement. In the absence of the Plan the risks facing local biodiversity assets are likely to continue and be less effectively addressed although these risks should still be addressed to some extent through the development management process.

Heritage Assets

- Key Sustainability Issue
 - Poorly planned development could adversely affect some of Exeter's heritage assets.
- Likely Evolution of the Issue without the Exeter Plan
 - The new Exeter Plan provides an opportunity to conserve and enhance the historic environment as well as improve the accessibility and interpretation of it. In the absence of the Plan the risks facing local heritage assets are likely to continue and be less effectively addressed although these risks should still be addressed to some extent through the development management process.

Landscape

- Key Sustainability Issue
 - The landscape setting of the City could be adversely affected by inappropriate development.
- Likely Evolution of the Issue without the Exeter Plan
 - The new Exeter Plan offers an opportunity to ensure that sensitive landscapes are protected and enhanced as appropriate and that development is designed to take account of the variation in character and sensitivity across and around the City. In the absence of the Plan it is more likely that piecemeal development proposals may come forward and that the landscape setting of the City would be adversely impacted.

Climate Change Mitigation and Adaptation

- Key Sustainability Issue

- Hotter, drier summers are expected as a result of ongoing and accelerating climate change, which have the potential for adverse effects on human health.
- High flood risk in some areas particularly around the River Exe, which is expected to increase due to climate change.
- There are continued high CO2 emissions from transport.
- Likely Evolution of the Issue without the Exeter Plan
 - The new Exeter Plan offers another opportunity to update the City's approach to managing the effects of the changing climate and associated weather events, particularly in the design of new buildings and green infrastructure.
 - The new Exeter Plan offers an opportunity to contribute further to mitigate the potential effects of any flooding and help the City's communities adapt to the increased likelihood of significant weather events in the future.
 - The new Exeter Plan offers an opportunity to improve public and active transport connections and capacity, and provide development of housing, employment, services and facilities in locations that will reduce the need to travel by car.
 - In the absence of the new Plan, these issues would be addressed to some degree during the development management process and by relying on national policy. However, they would be less effectively addressed compared to having up to date and locally specific policies set out in the new Exeter Plan.

Natural Resources and Pollution

- Key Sustainability Issue
 - There are small areas of Grade 3 agricultural land, and small areas in the south east of Grades 1 and 2.
 - There is an Air Quality Management Area in Exeter, which was designated because the area exceeds set thresholds for nitrogen

dioxide caused primarily by road traffic emissions. Development in close proximity to the AQMA could lengthen its status as an AQMA. Outside of the AQMA, although air quality may be within legal limits, there is still concern present in relation to air quality, particularly as a result of road congestion.

- Although in the most part, surface water quality is moderate to good across Devon, there is a small incidence of poor quality affecting parts of the Exe Estuary.
- Likely Evolution of the Issue without the Exeter Plan
 - The new Exeter Plan provides an opportunity to ensure that these natural assets are not lost or compromised by future growth in the City by prioritising the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile.
 - The new Exeter Plan provides an opportunity to set out measures to mitigate air quality exceedances without inhibiting the need for the City to grow.
 - The new Exeter Plan has the potential to secure long term sustainable development, which will be essential in ensuring that all new development implements water efficiency standards, and that the phasing of new development is in line with any implementation timescales for any new strategic schemes that water companies might require.
 - In the absence of the new Plan, these issues would be addressed to some degree during the development management process and by relying on national policy. However, they would be less effectively addressed compared to having up to date and locally specific policies set out in the new Exeter Plan, as well as up to date site allocations which have been assessed in relation to the impacts on natural resources and pollution. Air quality may be addressed to some extent even in the absence of the new Plan through technological developments and an increase in the use of electric vehicles.

The SA Framework

3.61 As described in Chapter 2, the relevant objectives established via the review of plans, policies, and programmes and the key sustainability issues identified by the baseline review informed the development of a framework of sustainability objectives, the SA framework, against which the plan is being assessed. The SA framework for the Exeter Plan is presented in the section below.

3.62 The context for the appraisal of options and policies against each of the SA objectives is set by the sub-objectives or decision-making criteria presented below. These criteria provide a guide for the appraisal of options, identifying issues relating to the SA objective that should be considered where relevant. Given the large number of issues relating to each SA objective, it is not possible to list all those that are related and relevant and therefore the decision-making criteria should not be considered to be prescriptive or exhaustive. In effect the criteria act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate.

3.63 As a result of the Scoping consultation, a small number of changes were made to some of the SA objectives in the SA framework after it was presented in the Scoping Report. These are detailed in Appendix A.

SA framework for the Exeter Plan

SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change

- Appraisal Questions

- Will the policy/option promote energy efficient and water efficient design?
 - Will the policy/option encourage the generation and use of clean, low carbon, decentralised and renewable electricity and heat?
 - Will the policy/option promote design which will help to mitigate the effects of climate change (for example through appropriate building orientation and appropriate incorporation of SuDS)?
 - Support the protection, restoration, creation, enhancement and the multi-functionality of the green/blue infrastructure network?
 - Will the policy/option support/enable the mitigation and/or adaptation measures needed to address climate change impacts on the natural environment?
- Relevant SEA Topic(s)
- Climate

SA Objective 2: To provide a suitable supply of high quality housing including appropriate mix of types and tenures

- Appraisal Questions
- Will the policy/option supply an appropriate quantity of housing to satisfy demand?
 - Will the policy/option supply an appropriate mix of types and tenures of properties in relation to the respective levels of demand?
 - Will the policy/option address the housing needs of more specialist groups, including older people and people with disabilities?
 - Will the policy/option promote housing that is of high quality?
- Relevant SEA Topic(s)
- Population

- Human Health
- Material Assets

SA Objective 3: To support sustainable and diverse growth of the City's economy and maximise employment opportunities

■ Appraisal Questions

- Will the policy/option allow for the delivery of land and infrastructure to meet the City's projected economic needs?
- Will the policy/option support the prosperity and diversification of the City's economy?
- Will the policy/option support the vitality and viability of Exeter's City Centre as well as the District and Local Centres?
- Will the policy/option promote the achievement of a low carbon economy?
- Will the policy/option lead to an adequate supply of land and infrastructure to meet the City's employment needs with sufficient flexibility to respond to uncertainties following Britain's exit from the EU and the COVID-19 pandemic?
- Will the policy/option support opportunities for the expansion and diversification of businesses?

■ Relevant SEA Topic(s)

- Population
- Material Assets

SA Objective 4: Improve the physical health and wellbeing of residents and reduce health inequalities

■ Appraisal Questions

- Will the policy/option ensure people are adequately served by key healthcare facilities, regardless of socio-economic status?
- Will the policy/option ensure provision for new, or replacement healthcare facilities to ensure there is capacity to meet the level of development planned for and access for all?
- Will the policy/option promote health and wellbeing by providing access to and maintaining, enhancing, connecting and creating multifunctional open spaces, green/blue infrastructure, recreation and sports facilities, and connecting people with nature?
- Will the policy/option contribute to narrowing health inequalities?

■ Relevant SEA Topic(s)

- Population
- Human Health
- Material Assets

SA Objective 5: Promote high quality design in new development and improve the character of the built environment

■ Appraisal Questions

- Will the policy/option promote visually attractive development with high quality design, layout and appropriate and effective landscaping?

■ Relevant SEA Topic(s)

- Material Assets

- Landscape
- Cultural Heritage

SA Objective 6: To support community cohesion and safety

- Appraisal Questions
 - Will the policy/option facilitate the integration of new neighbourhoods with existing neighbourhoods?
 - Will the policy/option meet the needs of specific groups in the City including those with protected characteristics and those in more deprived areas?
 - Will the policy/option promote developments that will benefit and will be used by both existing and new residents in the City, particularly within the City's most deprived areas?
 - Will the policy/option help to deliver cohesive neighbourhoods with high levels of pedestrian activity/outdoor interaction, which will allow for informal interaction between residents?
 - Will the policy/option help to reduce levels of crime, anti-social behaviour and the fear of crime?
- Relevant SEA Topic(s)
 - Population
 - Human Health

SA Objective 7: To provide good access to services, facilities and education

- Appraisal Questions

- Will the policy/option provide for development that is well linked to existing services and facilities (e.g. shops, post offices, GPs, schools, broadband) and employment areas?
- Will the policy/option contribute to improving access to educational facilities?
- Relevant SEA Topic(s)
 - Population
 - Human Health
 - Material Assets

SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives

- Appraisal Questions
 - Will the policy/option reduce reliance on private vehicles?
 - Will the policy/option improve public transport links to key facilities within the City?
 - Will the policy/option promote compact, mixed-use development, which encourages walking and cycling for short journeys?
 - Will the policy/option promote and facilitate the use of electric cars?
- Relevant SEA Topic(s)
 - Air
 - Climate
 - Population
 - Human Health

SA Objective 9: To protect residential amenity by reducing air, noise and light pollution

■ Appraisal Questions

- Will the policy/option have a negative impact on air quality in the Air Quality Management Area (AQMA)?
- Will the policy/option contribute to minimising air pollution from all sources?
- Will the policy/option prevent, avoid and/or mitigate adverse effects associated with neighbouring uses which could detrimentally impact residents (for example noise and light pollution)?

■ Relevant SEA Topic(s)

- Air
- Human Health

SA Objective 10: To conserve and enhance biodiversity and geodiversity

■ Appraisal Questions

- Will the policy/option conserve and enhance both designated and undesignated ecological assets within and outside the City, including achieving measurable biodiversity net gain?
- Will the policy/option conserve and enhance ecological networks, including not compromising future improvements in habitat connectivity?
- Will the policy/option have a negative impact on designated geodiversity sites?
- Will the policy/option have a negative impact on ancient woodland?

■ Relevant SEA Topic(s)

- Biodiversity
- Human Health

SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape

- Appraisal Questions
 - Will the policy/option protect and enhance the City's sensitive and special landscapes and townscapes?
 - Will the policy/option conserve and enhance the character and distinctiveness of the City's non-designated landscapes?
- Relevant SEA Topic(s)
 - Landscape
 - Cultural Heritage

SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets

- Appraisal Questions
 - Will the policy/option conserve and enhance the City's designated and non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?
 - Will the policy/option ensure the management and enhancement of the City's heritage assets, including bringing assets back into appropriate use, with particular consideration for heritage at risk?
 - Will the policy/option promote access to, enjoyment and understanding of the historic environment for residents and visitors of the City?

- Will the policy/option be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change?
- Relevant SEA Topic(s)
 - Cultural Heritage
 - Material Assets

SA Objective 13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources

- Appraisal Questions
 - Will the policy/option limit the amount of development in areas of high flood risk and areas which may increase flood risk elsewhere, taking into account the impacts of climate change?
 - Will the policy/option promote the use of SuDS and other flood resilient design?
 - Will the policy/option protect and improve the water quality and achieve nutrient neutrality of the City's rivers and inland water?
 - Will the policy/option support the efficient use of water?
- Relevant SEA Topic(s)
 - Water
 - Biodiversity

SA Objective 14: To support efficient use of resources, including land, minerals and waste

- Appraisal Questions

- Will the policy/option promote the re-use of previously development land?
- Will the policy/option avoid development on higher quality agricultural land?
- Will the policy/option promote the achievement of the waste hierarchy?
- Will the policy/option ensure that sterilisation of mineral resources is prevented unless development can be justified at locations where this would result?
- Relevant SEA Topic(s)
 - Soil
 - Material Assets

Chapter 4

Sustainability Appraisal Findings for the Strategic Options

4.1 This chapter presents the SA findings for the strategic policy options that have been considered for the Exeter Plan.

4.2 The Council considered four alternative spatial approaches for the Exeter Plan. These were considered by the Council to be the reasonable alternative options for meeting the need for development identified over the plan period.

- Option A: Focus most development on large, strategic brownfield sites.
- Option B: Focus on developing greenfield sites.
- Option C: Dispersal on smaller sites.
- Option D: Focus on public transport hubs and routes within the city.

4.3 No reasonable alternative quantum options have been considered in the SA, for the reasons described in Chapter 2.

4.4 The likely effects of each spatial option are presented in Table 4.1 at the end of this section and justification for the identified effects is summarised by each SA objective below.

4.5 Minor positive effects are identified for Strategic Options A and D in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution, as Option A sets out that most growth will be close to key public transport hubs with good access to green infrastructure and Option D focuses development in areas well-served by public transport and active travel. These Options are likely to increase opportunities to access sustainable transport links thereby reducing congestion and pollution, and most development would be located within already developed areas thereby avoiding significant changes to residential

amenity. However, both Options are also likely to have minor negative effects on these objectives (resulting in mixed effects overall) as new development is likely to cause increased congestion in the City, contributing to pollution and the effects of climate change, particularly as the majority of commuters outside the City travel by car. Minor negative effects on SA objectives 1 and 9 are also identified for Strategic Options B and C as they are also likely to cause increased congestion. In addition, development under those options would be more dispersed across the City, potentially reducing opportunities to maximise the use of public transport and having a greater impact on residential amenity. Development would also include more greenfield sites under those two options, therefore potentially negatively impacting the green infrastructure network. In all cases, the effects identified are uncertain as they will be dependent on the exact location, scale and design of new development.

4.6 All of the strategic options will deliver housing and employment land within the City, which will provide a range of housing types and employment opportunities for residents. However, significant negative effects are identified for Options B, C and D in relation to SA Objective 2: Housing and SA Objective 3: Economic growth as they are unlikely to be able to accommodate the scale and mix of development to meet the required need. This may result in a lack of housing and employment provision where it is needed, and also result in longer commuting patterns for Exeter residents if these options are not able to provide enough homes or jobs locally thereby leading to increased pollution and climate change effects. Option A, however, is expected to have minor positive effects on SA Objective 2 and 3, as it expected to accommodate the scale and mix of development required.

4.7 Strategic Options A, C and D direct development towards strategic and/or dispersed, infilled locations that are likely to be closer to the city centre, key transport hubs and routes, and close to services, facilities, and infrastructure. This is likely to provide opportunities to ensure good access to healthcare, services, facilities and education, and also support community cohesion and safety. Therefore, minor positive effects are identified for Options A and C in relation to SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education. Option B is likely to have mixed effects on these objectives – although it is also likely to have positive effects

due to the proximity of and access to development locations within the City, Given its relatively small size, focusing most development on greenfield sites is more likely to result in people having more restricted access to key services and facilities, as the development may be relatively more peripheral. As a result, mixed effects overall are identified for Option B in relation to SA Objectives 4, 6 and 7.

4.8 Minor positive effects are identified for Strategic Options A, C and D in relation to SA Objective 5: Design and the Built Environment, as these Options will direct development towards previously developed land, infill sites and/or amongst existing development and transport infrastructure which is likely to contribute to and/or improve the existing built environment of the City. Strategic Option B is also likely to result in development of high quality but may also potentially have negative effects on the character of the built environment and landscape due to its focus on developing greenfield sites that are more sensitive areas. In all cases, the effects identified are uncertain, as they will be dependent on the exact location and design of new development.

4.9 The majority of Exeter residents travel to work by sustainable modes, and residents currently still represent the largest part of the City's labour pool. Strategic Option A is expected to continue to support reducing the need to travel by private vehicle and encourage sustainable modes due to the proximity and access of development locations within the City, and in particular Options A focuses development in locations close to public transport hubs and routes, and maximises active travel. Therefore, positive effects are identified for Option A in relation to SA Objective 8: Sustainable Travel. Options B, C and D are expected to have minor negative effects as all Options may result in a lack of housing and employment provision where it is needed, which could result in longer commuting patterns if these Options are not able to provide enough homes or jobs locally. Additionally, Options B and C may also potentially have negative effects due to directing development towards greenfield and dispersed sites that may restrict access to sustainable modes of travel, thereby potentially increasing travel by private vehicle.

4.10 Exeter contains a rich variety of wildlife habits including European and National designations. All four Strategic Options are expected to have negative

environmental effects as they will all likely require land take on greenfield land, which could cause habitat loss and impact sensitive landscapes. Although Option A focuses most development on brownfield sites which generally have lower biodiversity value, some development would still occur on greenfield land and it is also recognised that brownfield sites may still harbour valuable biodiversity. Therefore, at least minor negative effects are identified for all Options in relation to SA Objective 10: Biodiversity and Geodiversity and SA Objective 11: Landscape. Significant negative effects on these two objectives are identified for Strategic Option B as it focuses development on greenfield sites thereby potentially having greater effect on habitats, ecological networks and landscapes. In terms of the historic environment, negative effects are identified for all of the Strategic Options in relation to SA Objective 12: Cultural Heritage as there is potential for development in any proposed locations to have adverse impacts on the setting of heritage assets. Option A is likely to have significant negative effect with Options B, C and D having minor negative effects against SA Objective 12: Cultural Heritage. Option A performs less well due to the high density of heritage assets, in particular listed buildings, and the presence of an Area of Archaeological Importance within Exeter city centre. There is a degree of uncertainty for all of the identified effects for biodiversity and geodiversity, landscape and heritage, as effects will be dependent on the exact scale, location and design of any development and any mitigation or enhancement measures included.

4.11 All four Strategic Options are considered to have negative effects in relation to SA Objective 13: Water as while where possible they aim to steer development to avoid areas of higher flood risk, all could still result in development within higher areas of flood risk. Option A is considered to have a significant negative effect whereas Option B and C would have minor negative effects. Option A directs most development to large brownfield sites, many of which in Exeter are in flood zones 2 and 3. Option B could result in the loss of more permeable greenfield land, although greenfield land in Exeter is located largely outside of Flood Zone 3. Option C includes the proposal of infill development which could result in the loss of important pockets of permeable land in between existing built development, thereby increasing flood risk. However, smaller sites would provide more flexibility to avoid development flood zones when compared to larger brownfield sites. In all cases, the effects

identified are uncertain as they will be dependent on the exact location of new development and the proposals for how any residual flood risk is managed, for example the incorporation of SuDS within new developments.

4.12 The majority of land within Exeter is classed as being in Urban Use with small areas designated as higher agricultural land classification (ALC). There are small bands of land to the north designated as Grade 3 ALC and areas to the south-east designated as Grades 1 and 2. Minor positive effects are identified for Strategic Options A, C and D in relation to SA Objective 14: Resources as they all encourage development to be directed mainly towards previously developed land. In contrast, Option B focuses development on greenfield sites and therefore significant negative effects are identified in relation SA Objective 14. Minor negative effects are also identified for Options A, C and D as they do not rule out the development of small areas of greenfield land. The effects are uncertain for Strategic Options A, C and D as they will be dependent on the exact location of new development.

Table 4.1: Summary of SA findings for the Strategic Options

SA Objective	Option A	Option B	Option C	Option D
1: To achieve net-zero emissions and support adaptation to unavoidable climate change	+/-?	-?	-?	+/-?
2: To provide a suitable supply of high quality housing including an appropriate mix of types and tenures	+	--	--	--
3: To support the sustainable and diverse growth of the City’s economy and maximise employment opportunities	+	--	--	--
4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities	+	+/-	+	+
5: Promote high quality design in new development and improve the character of the built environment	+?	+/-?	+/-?	+/-?
6: To support community cohesion and safety	+	+/-	+	+
7: To provide good access to services, facilities and education	+	+/-	+	+
8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives	+	-	-	-
9: To protect residential amenity by reducing air, noise and light pollution	+/-?	-?	-?	+/-?
10: To conserve and enhance biodiversity and geodiversity	-?	--?	-?	-?
11: To conserve and enhance the character and distinctiveness of the landscape	-?	--?	-?	-?
12: To conserve and enhance the historic environment including the setting of heritage features	--?	-?	-?	-?
13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources	--?	-?	-?	-?
14: To support efficient use of resources, including land, minerals and waste	+/-?	--	+/-?	+/-?

Chapter 5

Sustainability Appraisal Findings for the Site Options

5.1 This chapter summarises the SA findings for the reasonable alternative development site options that have been considered for allocation in the Exeter Plan. A total of 107 residential sites, 27 mixed use sites and three employment sites have been appraised.

5.2 As described in Chapter 2, some changes have been made to the site appraisal work since the SA report for the Full Draft Plan was published. Through the Call for Sites that was undertaken alongside the Full Draft Local Plan, an additional 31 reasonable site options have been identified and these are now appraised in this chapter. In addition, amendments have been made to the boundaries of some of the existing site options, and some of the proposed site uses have changed following consultation on the Full Draft Plan. The appraisals of those sites have been updated accordingly in this chapter.

5.3 Some sites previously allocated in the Exeter Core Strategy and Exeter Local Plan First Review have been considered as potential allocations for the new Local Plan, alongside the other reasonable alternative options. The SA methodology for all sites has been the same, and the previous allocation of these sites in the Core Strategy does not influence their performance in the SA.

5.4 The likely effects of each site option are presented in Table 5.1 for residential sites, Table 5.2 for mixed use sites and Table 5.3 for employment sites. Justification for the identified effects is summarised by each SA objective below.

5.5 The criteria against which the site options have been appraised are presented in Appendix D. These remain largely unchanged since the previously round of site appraisal work. However, as explained in Chapter 2, a change has

been made to the criterion for SA Objective 10: Biodiversity and Geodiversity so that it no longer draws on IRZ data. All of the site options, including those appraised previously, have been re-appraised against the updated criterion for consistency.

SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change

5.6 SA Objective 1 was scoped out of the appraisal of residential, mixed use and employment site options. The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Exeter Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA Objective 8, while proximity to services and facilities, which will also influence levels of car use, is considered under SA Objective 7. The likely effects of all site options on this objective are therefore negligible.

SA Objective 2: To provide a suitable supply of high quality housing including an appropriate mix of types and tenures

5.7 Minor positive effects are expected for almost all of the residential site options, a total of 93 sites, as they would deliver fewer than 100 homes, therefore making some, but not an individually significant, contribution to the total housing requirement of Exeter City. Only 14 residential site options are expected to deliver more than 100 homes and therefore would have significant positive effects. These sites are spread across the city and largely involve the redevelopment of existing sites. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Exeter Plan policies which are appraised separately in Chapter 6.

5.8 The majority of the mixed use sites (26 out of 27) are expected to have significant positive effects, as they would comprise 100 dwellings or more. It is expected that these large mixed use sites would be able to offer a wide mix of housing, including affordable housing, as well as making a good contribution towards local housing needs. Only one mixed use site option (Site ID 20) is expected to have minor positive effects as it has capacity to deliver fewer than 100 homes. However, in all cases the positive effects will be uncertain depending on how much of the mixed use sites are used for residential development as opposed to other uses which is not known at this stage.

5.9 The location of employment site options is not considered likely to affect this objective; therefore the effects of all those site options are negligible.

SA Objective 3: To support the sustainable and diverse growth of the City's economy and maximise employment opportunities

5.10 The provision of new employment sites is likely to have a positive effect on SA Objective 3 as these sites are expected to deliver new job opportunities and support economic growth within Exeter City. Therefore, the three employment site options (Site IDs 136, 140 and 141) are all expected to have significant positive effect in relation to SA Objective 3.

5.11 The majority of the residential site options are expected to have negligible effects on SA Objective 3 as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. However, consideration has been given to potential negative effects resulting from the conversion of existing employment uses to residential. The Exeter Employment Land Study has identified 10 existing employment sites (Site IDs 53, 54, 68, 102, 120, 121, 122, 123, 124 and 136) which are predominantly located in the Marsh Barton industrial estate and the city centre of Exeter, as having good suitability for employment use. These sites have all been appraised as reasonable alternative residential or mixed use site options and all are therefore

expected to have significant negative effects in relation to SA Objective 3, as the existing employment uses would be converted to residential or residential with a possibility of employment use.

5.12 Minor positive effects are expected for all mixed use sites in relation to SA Objective 3, as all sites would positively contribute to the growth of the City's economy, as it is assumed that all mixed use site options would incorporate some element of employment generating uses. However, four mixed use site options (Site ID: 14, 52, 89 and 146) are also expected to have significant negative effects, as they could result in the conversion of existing employment uses to mixed use, some of which would be residential. These effects are uncertain, as it is unknown how much of the existing employment uses would be retained.

SA Objective 4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities

5.13 A total of 107 residential sites options are expected to have positive effects on SA Objective 4, with 63 having significant positive effects as they would either provide more than 1,000 homes or are within 720m of a healthcare facility and an area of open space/sports facility. Only one residential site option (Site IDs 92) is expected to have a minor negative effect as it is not located within 720m of a healthcare facility or an area of accessible open space. This reflects the fact that Exeter is well provided with open space, with the parks and green space data identifying that there are good levels of provision and distribution, with most people living within a 10 minute walk of a formal or informal green space, for example. For the same reasons, all mixed use site options are expected to have positive effects on SA Objective 4, with almost half having significant positive effects. However, 12 of the residential sites and six of the mixed use site options are also expected to have significant negative effects as they are within an area of open space and/or accommodate an outdoor sports facility, which may be lost as a result of development. However, these negative effects are uncertain as the effects will depend on the exact scale, layout and

design of development and whether these existing features would in fact be lost to new development.

5.14 The three employment site options are expected to have positive effects on SA Objective 4 as they are within 720m of either an area of open space or footpath/cycle path. Two of the employment site options (Site IDs 136 and 140) are expected to have significant positive effects as the sites are within 720m of an area of open space and at least one footpath/cycle path.

SA Objective 5: Promote high quality design in new development and improve the character of the built environment

5.15 SA Objective 5 was scoped out of the appraisal of residential, mixed use and employment site options. The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Exeter Plan and details submitted at the planning application stage. The likely effects of all site options on this objective are therefore negligible.

SA Objective 6: To support community cohesion and safety

5.16 Overall, Exeter is not considered to be particularly deprived. Deprivation is largely concentrated to nine small areas which are within the 20% most deprived nationally. Out of the site options, only 19 residential, seven mixed use and one employment sites are expected to have minor positive effects on SA Objective 6, as they are within an area which is within the 20% most deprived and which could therefore benefit most from regeneration. These areas include the City Centre, Stoke Hill, Whipton and at the St Lukes Campus. All other site options are expected to have negligible effects as they are outside of these more deprived areas. That is not to say these sites won't support community cohesion and safety, but the degree of effects they will have will depend in part

on the detailed proposals for sites and their design, such as the incorporation of green space and appropriate lighting, which are not known at this stage.

SA Objective 7: To provide good access to services, facilities and education

5.17 The City Centre is the main focus of services and facilities within Exeter, although the District and Local Centres also provide services and facilities commensurate with their size. This is evident in the appraisal of residential and mixed use site options against SA Objective 7, as the sites that are likely to have an overall minor negative effect are predominantly located away from the City Centre on the outskirts of Exeter. These sites are expected to deliver fewer than 1,000 homes, or are further than 720m from the City Centre, or a District or Local Centre, and are more than 900m from a secondary school and 450m from a primary school. Only 21 of the residential site options and one of the mixed use options are expected to have a minor negative effect for these reasons.

5.18 The remaining site options vary in their expected effects on SA Objective 7, with many sites having mixed positive and negative effects. The remaining site options are expected to have a minor positive effect on at least one element of the SA Objective; predominantly they are within 720m of a District or Local Centre, and/or are within 900m of a secondary school or 450m of a primary school. Thirty seven of the residential site options and 11 of the mixed use site options are expected to have positive effects overall, with at least one effect significant, due to being within close proximity to services, facilities and education provision.

5.19 The employment site options were only considered in relation to their distance to City, District or Local centres. Employment sites located in close proximity to City, District and Local centres allow easier access to services and facilities for employees during breaks and before and after work. One of the employment site options (Site ID 141) is expected to have a significant positive effect as it is located within 720m of the City centre. The remaining two employment site options (Site ID 136 and 140) are expected to have minor negative effects as they are not located within walking distance of either a City,

District or Local centre and therefore do not have good access to services and facilities for employees.

SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives

5.20 The majority of all the residential, mixed use and employment site options are expected to have positive effects against SA Objective 8, with 43 residential sites, seven mixed use and one employment site expected to have minor positive effects and the remaining sites expected to have significant positive effects. This is because the majority of the sites are within 800m of a railway station and 400m of a bus stop. The development of these sites will only improve the current positive situation in Exeter, where the majority of residents already travel by sustainable modes. Only two residential site (Site IDs 92 and 153) are likely to have minor negative effects as these sites are located more than 800m from a railway station and more than 400m from a bus stop and cycle path. The proximity of sites to services and facilities will also influence the need to make use of car travel day-to-day, and this is covered under SA objective 7.

SA Objective 9: To protect residential amenity by reducing air, noise and light pollution

5.21 The majority of residential site options are expected to have negligible effects on SA Objective 9, as they are not within 100m of the Air Quality Management Area (AQMA) that has been declared along the main traffic routes in the City and are not expected to impact residential amenity through exposure of new residents to noise due to their distance from and/or position in relation to Exeter Airport and the M5. Fifty one residential site options are expected to have significant negative effects, as 44 are within 100m of the AQMA and seven sites are adjacent to the M5. Similarly, 14 mixed use site options are expected

to have significant negative effects as ten mixed use site are within 100m of the AQMA and four are adjacent to the M5. One of the employment site options (Site ID 141) is located within 100m of the AQMA and therefore a significant negative effect is expected. The negative effects for the sites adjacent to the M5 are uncertain as noise exposure could potentially be reduced through mitigation. If any of these sites are taken forward for allocation in the Exeter Plan, consideration could be given to including a requirement for appropriate mitigation. This could include consideration to whether the residential components of the mixed use sites can be sited away from the parts of the sites closest to the M5, as the employment uses are likely to be less sensitive to noise.

SA Objective 10: To conserve and enhance biodiversity and geodiversity

5.22 Exeter contains a rich variety of wildlife habitats due to a combination of geology/topography and geography combined with enlightened protection and enhancement. The concentration of designated sites has resulted in the majority of residential and mixed use sites being found to have likely negative effects (either minor or significant) on SA objective 10 because of their proximity to internationally or nationally or locally designated biodiversity or geodiversity sites. In particular, the Exe Estuary lies to the south of Exeter City and is designated as a Special Protection Area (SPA) and a Ramsar site.

5.23 Eleven of the residential site options (Site IDs 23, 41, 84, 85, 86, 95, 98, 99, 114, 115 and 154) and two of the mixed use (Site IDs 42 and 88) could have significant negative effects as they contain all or part of a Local Wildlife Site, and some are also within 250m of national biodiversity designations. Site IDs 23, 41 and 42 are located within 250m of Bonhay Road Cutting SSSI. All other site options are located in close proximity to the Exe Estuary SPA and Ramsar site.

5.24 A further 32 of the residential site options and 17 of the mixed use site options could have minor negative effects as they are within 250m of a Local Wildlife Site or are within 250m-1km of a nationally designated biodiversity or

geodiversity site. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists for all negative effects identified, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.

5.25 As well as considering proximity to designated sites, the site options were also assessed as to whether the site contains green infrastructure and therefore could result in the loss of those existing green infrastructure assets as a result of new development. A total of 27 residential and 11 mixed use site options could have mixed effects for this reason. However, these effects remain uncertain as it may be possible to conserve or even enhance the onsite green infrastructure assets through the design and layout of the new development.

5.26 If any of these sites are allocated in the Exeter Plan, consideration could be given to whether these assets can be conserved or enhanced as part of the proposed new development, or whether alternative provision can be made nearby.

5.27 For all sites, the potential impacts on biodiversity present on each site cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape

5.28 The likely effects of the site options on the landscape have been assessed drawing from the landscape sensitivity study that has been carried out by Exeter City Council [\[See reference 14\]](#). Twenty residential and 12 mixed use options could have significant negative effects as they are in areas of high or medium-high landscape sensitivity. A further six residential site options could have minor negative effects as they are in areas of medium landscape sensitivity. The employment site options are most likely to have negligible effects, as they are

located outside of the most sensitive landscape areas. However, in all cases the effects are uncertain as they cannot be assessed with certainty at this strategic level and effects will be determined by factors such as the design and layout of individual developments, including any mitigation that may be incorporated.

SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets

5.29 Exeter City Council undertook a Heritage Impact Assessment to determine the impact of each site option against nearby heritage assets including the setting of the heritage asset. Each site option was given a RAG rating which has been converted to a positive or negative effect in the SA. The majority of the site options were rated as green in the Heritage Impact Assessment which is interpreted as a negligible effect in the SA. This means that development of the majority of these site options is unlikely to cause harm to the significance of historic assets in Exeter City. Thirty three residential, ten mixed use and one employment site option are rated red and therefore could have significant negative effects in relation to SA Objective 12 as the development of these site options could cause substantial harm to the significance of a heritage asset.

SA Objective 13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources

5.30 Over half of the residential, mixed use and employment site options are expected to have negligible effects on SA Objective 13, while the remaining site options are expected to have negative effects, predominantly significant negative. This includes largely mixed use sites (Site IDs 12, 14, 15, 22, 34, 39, 97, 128 146, and 170). This predominantly results from those sites being entirely or mainly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. These effects mainly result from the

River Exe and its tributaries posing the greatest risk of fluvial flooding with large areas along the River Exe located within Flood Zone 3, particularly the areas stretching along the River Exe from Exwick, St Thomas to Marsh Barton and further south-east towards Topsham.

5.31 None of the residential, mixed use and employment site options are located within Source Protection Zones, and a very small number of sites contain a water body or watercourse. As mentioned above, the majority of effects in relation to SA Objective 13 are influenced by sites' locations in respect to flood risk. If any of these sites are taken forward for allocation in the Exeter Plan, consideration could be given to including a requirement for the incorporation of SuDS. Where only part of a site is in an area of higher flood risk, consideration could be given to whether built development can be directed to other parts of the site, with the area of higher flood risk remaining as open space, for example.

SA Objective 14: To support efficient use of resources, including land and minerals

5.32 The majority of land within Exeter City is classed as in urban use. However, 10 residential and one mixed use site options are expected to have minor negative effects on this SA Objective as they are mainly or entirely greenfield land and contain a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land. These sites are predominantly located towards the northern, western and eastern limits of Exeter. A further 35 residential, 14 mixed use and one employment and site option are expected to have significant negative effects as they are mainly or entirely greenfield land located within Grade 1 and/or 2 agricultural land in the south-east. If these sites are taken forward for allocation in the Exeter Plan, the resulting negative effect will not be able to be mitigated. However, 62 residential, 12 mixed use and two employment site options are expected to have significant positive effects as they comprise brownfield land, the redevelopment of which represents more efficient use of land in comparison to the development of greenfield sites.

5.33 Only two mixed use site options (Site ID 14 and 170) are located within a Mineral Safeguarding Area (MSA) and are therefore expected to have minor negative effects due to the potential to sterilise minerals resources. All other site options are expected to have mixed effects on this SA Objective overall, with a negligible effect with regards to minerals as the sites do not fall within a MSA.

Summary

5.34 In terms of the most and least sustainable site options, looking across the suite of SA objectives there are no sites that stand out as being overwhelmingly more or less sustainable than other options. One residential site option and three mixed use site options are expected to have significant negative effects across five or more SA Objectives (residential Site ID: 152 and mixed use Site ID: 12, 34 and 39). If any of these site options are taken forward in the Exeter Plan, particular consideration should be given to mitigation. Of these sites, residential site (Site ID: 152) currently has the fewest significant positive effects and is the worst performing site overall.

Table 5.1: Summary of SA findings for the Residential Site Options

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
2	Landing adjoining 6 Exe View Cottages	0	+	0	++	0	0	++/-?	++	--/0	0?	--?	--	0	-/0
4	Land at Redhills, Exwick Lane	0	+	0	+	0	0	+/+?	+	0	0?	--?	0	0	--?/0
5	Land at Lugg's Farm, Redhills	0	+	0	+	0	0	+/-?	+	0	-?/--?	--?	--	0	--?/0
7	Merrivale Road	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	0	0	++/0
9	Flowerpot Lane Car Park, Flowerpot Lane	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	0	0	++/0
10	Okehampton Street Car Park, Okehampton Street	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	0	0	++/0
11	Land at Ide House	0	+	0	++	0	0	-/-?	+	0	0?/--?	--?	-	0	--?/0
13	Land at Taunton Close	0	+	0	+	0	0	+/+?	+	0	0?	0?	0	0	++/0
17	Land west of Shillingford Road	0	+	0	++	0	0	-/-?	+	0	0?	0?	0	0	--/0
18	Land adjoining Silverlands, Chudleigh Road / Land west of Chudleigh Road	0	+	0	++	0	0	-/-?	+	0	0?	0?	-	0	--/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
21	Land between Lower Argyll Road and Belvedere Road	0	+	0	+	0	0	-/-?	+	0	-?/--?	--?	-	0	--?/0
23	Land to the rear of 43 St Davids Hill	0	+	0	++	0	0	++/+?	++	--/0	--?/--?	0?	--	0	-/0
24	99 Howell Road	0	+	0	++	0	0	++/-?	++	--/0	-?	0?	--	0	++/0
25	Bystock Terrace Car Park, Queens Terrace	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
26	Land at Exeter Squash Club, Prince of Wales Road / Devon and Exeter Squash Club	0	+	0	++/--?	0	0	++/-?	++	0	0?/--?	0?	--	0	++/0
27	Wynford Road	0	+	0	++	0	0	++/+?	++	0	0?	0?	0	0	++/0
29	Land at Pendragon Road / Land off Pendragon Road	0	++	0	+	0	+	+/+?	+	0	-?/--?	--?	0	0	--?/0
30	Rear of Beacon Lane shops	0	+	0	+	0	0	++/+?	++	0	0?	0?	0	0	++/0
31	Lancelot Road	0	+	0	+	0	+	++/+?	+	0	0?	0?	0	0	++/0
33	Land off Spruce Close	0	+	0	+	0	0	+/+?	+	0	0?	--?	0	0	--?/0
36	Woolsgrove, Church Hill	0	+	0	++	0	0	+/+?	++	0	0?	--?	0	0	--?/0
37	Land at Home Farm	0	+	0	+	0	0	+/+?	++	0	0?/--?	--?	0	0	--?/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
40	Exbridge House, 26 Commercial Road	0	+	0	+	0	+	++/-?	++	--/0	-?/--?	0?	--	--?	++/0
41	Land between St Annes Well Brewery and Exeter College, Lower North Street	0	+	0	++	0	0	++/+?	++	--/0	--?	0?	--	0	++/0
43	Mary Arches Multi-Storey Car Park, Mary Arches Street	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
44	Mecca Bingo, 12 North Street	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
45	Smythen Street Car Park	0	+	0	+	0	+	++/-?	++	--/0	-?	0?	--	0	++/0
47	Cathedral and Quay Car Park, Lower Coombe Street	0	+	0	++/--?	0	+	++/-?	++	--/0	-?	0?	--	0	++/0
48	Magdalen Street Car Park, Magdalen Street	0	+	0	++	0	+	++/-?	++	--/0	-?	0?	--	0	++/0
50	Howell Road Car Park	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
51	12-31 Sidwell Street / Land at Sidwell Street	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
53	City Point, Bampfylde Street	0	++	0/--?	++	0	+	++/+?	++	--/0	-?	0?	--	0	++/0
54	Triangle Car Park, Russell Street	0	+	0/--?	++	0	+	++/+?	++	--/0	0?	0?	--	0	++/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
55	Pyramids Leisure Centre, Heavitree Road	0	+	0	++/--?	0	+	++/+?	++	--/0	0?/--?	0?	--	0	++/0
56	Parr Street Car Park, Parr Street	0	+	0	++	0	+	++/+?	++	--/0	0?	0?	-	0	++/0
58	Fairbanks, 90 Polsloe Road	0	+	0	++	0	0	++/+?	++	--/0	0?	0?	--	0	++/0
60	Land at Hamlin Lane	0	+	0	+	0	0	+/-?	++	--/0	0?	0?	-	0	++/0
63	Clifford Close	0	+	0	++	0	+	+;++?	++	0	0?	0?	0	0	++/0
64	Whipton Community Hospital, Hospital Lane	0	++	0	++	0	0	+/+?	+	0	0?	0?	0	0	++/0
66	Land at Cumberland Way	0	+	0	++	0	0	+;++?	++	0	0?	0?	0	0	--/0
67	Grenadier Emperor, Grenadier Road	0	+	0	++	0	0	-/+??	++	0	0?	0?	0	0	--/0
68	Grenadier Land 29, Grenadier Road	0	+	0/--?	+	0	0	-/-?	+	0/--?	0?	0?	0	0	--/0
69	Magdalen Road Car Park	0	+	0	++/--?	0	0	++/-?	+	--/0	0?	0?	--	0	++/0
70	Mount Radford Lawn	0	+	0	++/--?	0	0	++/+?	+	--/0	0?	0?	--	0	-/0
72	Belle Isle Depot, Belle Isle Drive	0	+	0	+	0	0	-/+??	+	0	0?/--?	--?	-	0	++/0
73	91-97 Wonford Street	0	+	0	++	0	+	+/-?	+	0	0?	0?	0	0	++/0
75	Chestnut Avenue	0	+	0	++	0	+	-/+??	+	0	-?	--?	0	0	++/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
76	Bishop Westall Road	0	+	0	+/--?	0	0	+/+?	+	0	-?/--?	0?	0	0	--/0
79	Park and Ride Site, Digby Drive / Car park north of Digby Drive	0	+	0	+	0	0	-/+++?	++	0	0?/--?	0?	0	0	++/0
80	Former overflow car park Tesco Store, Russell Way	0	+	0	+	0	0	-/+?	++	0	0?/--?	0?	0	0	++/0
81	Land Adjacent Tesco Store, Russell Way	0	+	0	+	0	0	-/-?	++	0	0?/--?	0?	0	0	--/0
82	Land south of Russell Way	0	+	0	+	0	0	-/+?	++	0	0?/--?	0?	0	0	--/0
84	Garages at Lower Wear Road	0	+	0	+	0	0	+/+?	+	0	--?	0?	0	0	++/0
85	Land at Glasshouse Lane	0	+	0	+/--?	0	0	-/+?	+	0	--?/--?	0?	0	0	-/0
86	Wear Barton Playing Fields, Wear Barton Road	0	+	0	+/--?	0	0	-/+?	+	0	--?/--?	0?	-	0	-/0
91	Land at Newcourt Road, Topsham	0	+	0	+	0	0	-/+?	+	0/--?	-?	-?	0	0	--/0
92	Land to the east of Newcourt Road	0	+	0	+	0	0	-/-?	-	0	-?	-?	0	0	--/0
94	Land to the west of Newcourt Road	0	+	0	+	0	0	+/-?	++	0	-?	-?	0	0	--/0
95	Land at Topsham Golf Academy	0	+	0	+/--?	0	0	+/-?	++	0	--?/--?	-?	0	0	--/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
96	Land at Clyst Road, Topsham	0	+	0	+	0	0	-/-?	+	0	-?/--?	-?	0	0	--/0
98	Mays field, Topsham	0	+	0	++	0	0	+/-?	++	0	--?/--?	--?	--	0	--/0
99	Mount Howe Field Topsham	0	+	0	++	0	0	+/-?	+	0	--?	--	--	0	--/0
100	Fever & Boutique, 12 Mary Arches Street	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
102	Civic Centre, Paris Street	0	++	0/--?	++/--?	0	+	++/+?	++	--/0	-?	0?	-	0	++/0
103	Clarendon House, Western Way	0	+	0	++	0	+	++/+?	++	--/0	0?	0?	--	0	++/0
104	Former police station and central Devon magistrates court, Heavitree Road	0	++	0	++	0	+	++/+?	++	--/0	0?	0?	-	0	++/0
105	Honeylands, Pinhoe Road	0	+	0	++	0	0	++/+?	++	--/0	0?	0?	--	0	-/0
106	Land lying east of Pinn Lane	0	+	0	++	0	0	+/+?	++	0	0?	0?	-	0	--/0
107	Land south of Gypsy Hill Lane	0	+	0	++	0	0	-/-?	++	0?/--?	0?	0?	0	0	--/0
108	Hessary, Hollow Lane	0	+	0	++	0	0	-/+++?	++	0	0?	0?	0	0	--/0
109	Land to the north, south and west of the Met Office	0	++	0	++	0	0	-/+++?	++	0	0?	0?	0	0	--/0
110	88 Honiton Road	0	+	0	++	0	0	-/+++?	+	--/0	0?	0?	0	0	++/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
111	Sowton Park and Ride, Sidmouth Road	0	+	0	+	0	0	-/+++?	++	0	-?	0?	0	0	++/0
112	DOA & Exeter Mobility Centre, Wonford Road	0	+	0	++	0	0	+/+?	+	--/0	0?	0?	-	0	++/0
114	Corner of Retreat Drive and Exeter Road, Topsham	0	+	0	+	0	0	-/-?	+	0?/--?	--?	0?	0	0	++/0
115	Land at Retreat Drive, Topsham	0	+	0	+	0	0	-/-?	+	0?/--?	--?	0?	0	0	++/0
116	Land at Water Lane	0	++	0?	+	0	0	++/+?	++	0	0?	--?	0	0	++/0
117	Isca House, Haven Road	0	++	0?	+	0	0	++/-?	++	0	0?	--?	-	0	++/0
119	Falcon House, Falcon Road	0	+	0	+	0	0	-/-?	++	0	-?	0?	0	0	++/0
120	22 Marsh Green Road	0	+	0/--?	+	0	0	-/+?	+	0	0?	0?	0	0	++/0
121	RGB Exeter, Alphinbrook Road	0	++	0/--?	++	0	0	-/+?	+	0	0?	0?	0	0	++/0
122	1-9 Alpin Brook Road	0	+	0/--?	++/-	0	0	-/+?	+	0	0?	0?	0	0	++/0
123	CP Arts, Alphin Brook Road, Exeter	0	+	0/--?	+	0	0	-/-?	+	0	0?	0?	0	0	++/0
124	1-5 Elm Units, Grace Road South	0	+	0/--?	+	0	0	-/-?	+	0	0?	0?	0	0	++/0
125	Land behind 66 Chudleigh Road	0	+	0	++	0	0	-/-?	+	--/0	0?	0?	0	0	--/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
127	Knowle Hill, Dawlish Road	0	+	0	+	0	0	-/-?	+	0	0?	--?	0	0	--/0
129	Newbery Car Breakers, Redhills	0	+	0	+	0	0	-/-?	+	0	0?	--?	0	0	++/0
130	Vulcan Works, Water Lane	0	++	0?	+	0	0	++/+?	++	0	0?	0?	0	0	++/0
131	Exbridge House, 26 Commercial Road (2)	0	++	0	+	0	+	++/-?	++	--/0	-?/--?	0?	--	--?	++/0
132	Larkbeare House, Topsham Road	0	+	0	++	0	0	++/+?	+	--/0	0?/--?	0?	--	0	-/0
133	Land at Matford Lane	0	+	0	++	0	0	++/+?	+	--/0	0?/--?	0?	--	0	-/0
136	Land adjacent Ikea, Newcourt Way	0	+	0/--?	++	0	0	-/-?	++	0	0?	0?	0	0	--/0
143	Land at Cowley Bridge Road	0	++	0?	+	0	0	-/-?	+	--/0	0?	0?	0	0	++/0
148	Land Opposite 51 Homefield Road	0	+	0	++/--?	0	0	+/?	+	0	0?/--?	0?	-	0	-/0
150	Land and Buildings at Victoria Street	0	+	0	++	0	0	++/+?	++	--/0	0?	0?	0	0	++/0
151	Rougemont Switching Centre, Queens Road	0	+	0	++	0	0	++/+?	++	--/0	-?	0?	0	0	++/0
152	Barton Place, 4 Wrefords Link	0	+	0	+	0	0	-/-?	+	--/0	-/?--?	--?	--	0	--?/0
153	Land to the east of Newcourt Road 2, Topsham	0	+	0	+	0	0	-/-?	-	0	-?	-?	0	0	--/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
154	Land adjoining 1 and 2 Lower Shapter Street, Topsham	0	+	0	++	0	0	+/-?	++	0	--?	--?	--	0	--/0
156	The Pyramids, John Hannam House and Eaton House, Eaton Drive	0	++	0	++?/--?	0	+	++/+?	++	--/0	0?/--?	0?	-	0	++/0
157	62 and 64 Alphington Road, Exeter	0	+	0	++	0	0	++/+?	++	--/0	0?	0?	0	0	++/0
158	Land at Matford Lane (2)	0	+	0	++	0	0	++/+?	+	--/0	0?/--?	0?	--	0	-/0
159	Church Lawn, Church Hill	0	+	0	+	0	0	+/+?	+	0	0?	--?	0	0	--?/0
160	Unit 1, Summerland Street	0	+	0/-?	++	0	+	++/+?	++	--/0	0?	0?	0	0	++/0
163	Mary Arches multi-storey and surface car park, Mary Arches Street	0	++	0	++	0	0	++/+?	++	--/0	-?	0?	--	0	++/0
164	Land north of Tithebarn Way	0	+	0	++	0	0	+/-?	++	0/--?	0?	0?	0	--?	--/0
165	Gypsy Hill Hotel, Gypsy Hill Lane	0	+	0	++	0	0	-/+?	++	0/--?	0?	0?	0	0	++/0

Table 5.2: Summary of SA findings for the Mixed use Site Options

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
1	Hamlyns Farmhouse & Hamlyns Farm, St Andrews Road	0	++?	+	+	0	0	++/-?	++	0	0?/--?	--?	--	0	-/0
6	Land on the west side of Barley Lane	0	++?	+	+	0	0	+/-?	+	0	-?/--?	--?	0	0	--?/0
12	Oaklands Riding School and The Rosary, Balls Farm Road	0	++?	+	++	0	0	-/+++?	+	--/0	0?/--?	--?	--	--?	--?/0
14	Marsh Barton	0	++?	+/--?	++	0	0	++/+++?	++	--/0	0?	0?	-	--?	++/-?
15	Water Lane	0	++?	+/0?	++/--?	0	0	++/+++?	++	0	-?/--?	--?	--	--?	++/0
16	Haven Banks Retail Park, Water Lane	0	++?	+	+	0	0	++/+++?	++	0	-?	0?	-	0	++/0
20	Land at Bellenden, Wrefords Lane	0	+	+	+	0	0	-/-?	+	0	-?/--?	--?	-	0	--?/0
22	Red Cow/St Davids	0	++?	+	++	0	0	++/-?	++	--/0	-?	0?	--	--?	++/0
28	Land at Stoke Hill	0	++?	+	+/--?	0	+	++/+++?	+	0	-?/--?	--?	-	0	--?/0
34	Gray's Barn, Church Hill	0	++?	+	++	0	0	++/+++?	+	0	-?/--?	--?	-	--?	--?/0
39	West Gate	0	++?	+	++/--?	0	+	++/+?	++	--/0	-?/--?	--?	--	--?	++/0
42	North Gate	0	++?	+	++	0	+	++/+?	++	--/0	--?	0?	--	0	++/0
46	South Gate	0	++?	+	++	0	+	++/-?	++	--/0	-?	0?	--	0	++/0

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
52	East Gate	0	++?	+/--?	++/--?	0	+	++/+?	++	--/0	-?	0?	--	0	++/0
83	Land at St Bridget Nurseries, Old Rydon Lane / St Bridget Nurseries, Old Rydon Lane	0	++?	+	+	0	0	-/+?	++	0	0?	0?	-	0	--/0
88	Land at Seabrook Farm, Topsham	0	++?	+	+	0	0	-/+?	++	0/--?	--?/--?	0?	0	0	--/0
89	Sandy Gate	0	++?	+/--?	+	0	0	-/+?	++	0/--?	0?	0?	0	0	--/0
90	Land at Old Rydon Lane	0	++?	+	+	0	0	-/+?	++	0/--?	0?	0?	-	0	--/0
97	Land to the east of Clyst Road	0	++?	+	++	0	0	+/-?	++	0	-?	--?	-	--?	--/0
128	Land on the west of Barley Lane (2)	0	++?	+	+	0	0	+/-?	+	0	-?/--?	--?	-	--?	--?/0
134	Land at Stoke Hill (2)	0	++?	+	+	0	+	-/+?	+	0	-?	--?	-	0	--?/0
138	Land east of Clyst Road, Topsham (2)	0	++?	+	++/--?	0	0	+/-?	++	0	-?/--?	--?	0	0	--/0
139	Residual Land at Newcourt	0	++?	+	+	0	0	-/+?	++	0/--?	0?	0?	-	0	--/0
142	Exe Bridges Retail Park	0	++?	+	++	0	0	++/+?	++	--/0	-?	0?	-	0	++/0
145	East Gate (2)	0	++?	+/--?	++/--?	0	+	++/+?	++	--/0	-?	0?	--	0	++/0
146	Red Cow/St David's (2)	0	++?	+	++	0	0	++/-?	++	--/0	-?	0?	--	--?	++/0
170	Marsh Barton	0	++?	+	++	0	0	++/++?	++	--/0	0?	0?	-	--?	++/-?

Table 5.3: Summary of SA Findings for the Employment Site Options

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Education	SA8: Sustainab le Travel	SA9: Pollution	SA10: Biodiversi ty and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
136	Land adjacent Ikea, Newcourt	0	0	++	++	0	0	-	++	0	0?	0?	0	0	--/0
140	Land adjacent to Sandy Park	0	0	++	++	0	0	-	++	0	0?	0?	0	0	--/0
141	St Luke’s Health Campus, Heavitree Road	0	0	++	+	0	+	++	+	--/0	0?	0?	--	0	++/0

Chapter 6

Sustainability Appraisal Findings for the Publication Plan

6.1 This chapter sets out the assessments of the policies included in the Publication Plan, including any reasonable alternative options identified by the Council. In relation to many of the policies, the 'no policy' option was identified by the Council as a possible approach; however this option is not suitable for appraisal as it would represent an appraisal of existing policy such as the NPPF, which would not be appropriate for this SA.

6.2 The policy assessments are grouped by topic, as they appear in the Publication Plan. Consideration is given to the likely cumulative effects of the Publication Plan at the end of this chapter. The work in this chapter builds on the appraisal work that was carried out previously for the Full Draft Plan. The Publication Plan builds on that document and includes new policies as well as amended versions of policies included previously. Some of the amendments to the policies have been significant, however, the overall aim of the policies remains unchanged. The appraisal work in this chapter for policies that were included in the Full Draft Plan has been updated to reflect any changes to those policies, and the new policies have now also been appraised. There have also been amendments to a number of the site allocation policies previously included in the Full Draft Plan, which has included new site allocations. Specifically, two site allocation policies have been removed (Marsh Barton and North Gate); and the Topsham Infrastructure Framework policy has been added.

6.3 Due the nature of the Plan, unless stated otherwise effects are considered to be long-term and permanent.

6.4 A number of recommendations were made in a draft version of the SA report for the Publication Plan, which were considered by the Council in the final

version of the document. These are set out at the end of the chapter along with the Council's response.

Objectives

6.5 This section presents the appraisal of the objectives set out in the Publication Plan.

6.6 There are 11 objectives, each of which addresses one of the 11 topics by which the policies are grouped:

1. Climate Emergency: Make the fullest possible contribution to the mitigation of, and adaptation to, climate change working towards a net zero carbon city.
2. Homes: Provide the quantity, type, quality and affordability of homes that Exeter needs in the right locations.
3. Economy and Jobs: Develop the potential of the city for economic growth with a particular focus on the knowledge economy and ensure the benefits of jobs, skills and training are available to all.
4. The Future of our centres: Enhance the vitality of the city, district and local centres so they continue to provide a key role in our day-to-day lives supporting communities, prosperity and cultural identity.
5. Sustainable Transport and Communications: Deliver development in appropriate locations with high quality infrastructure to minimise the need to travel, maximise sustainable transport and support emerging forms of mobility to improve health, placemaking and to support net zero.

6. Natural Environment: Protect and enhance the city's unique natural setting provided by the hills, the valley parks and River Exe, and improve, extend and connect natural greenspaces and deliver net gains for biodiversity.
7. History and Heritage: Protect and enhance the city's unique historic character by promoting development that complements and celebrates the city's heritage, identity and culture.
8. Culture and Tourism: Explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination.
9. High Quality Places and Design: Deliver the development we need in high quality, liveable, connected places to support our local communities, economy, local environment and push towards net zero.
10. Health and Wellbeing: Promote inclusive development which supports communities in becoming healthier and more productive and helps Exeter to become the most active city in the UK.
11. Infrastructure and Facilities: Planning for new infrastructure and facilities at the right time and in the right places and protecting existing services that play an essential role in the lives of our residents and the success of the local economy.

6.7 The likely effects of the objectives in relation to each SA objective are shown in Table 6.1 and are described below the table.

Table 6.1: Summary of SA findings for the Objectives

SA Objective	Objective 1: Climate Change	Objective 2: Homes	Objective 3: Economy and Jobs	Objective 4: The Future of our Centres	Objective 5: Sustainable Transport and Communications	Objective 6: Natural Environment	Objective 7: History and Heritage	Objective 8: Culture and Tourism	Objective 9: High Quality Places and Design	Objective 10: Health and Wellbeing	Objective 11: Infrastructure and Facilities
SA1: Climate Change	++	0	0	0	+	0	0	0	+	0	+
SA2: Housing	0	++	0	0	0	0	0	0	0	0	0
SA3: Economic Growth	+	0	++	++	+	0	0	++	0	0	+
SA4: Health	0	0	0	0	+	0	0	+	+	++	+
SA5: Design and the Built Environment	0	+?	0	0	0	0	+	0	++	0	0
SA6: Community	0	+?	0	++	+	0	0	0	++	0	++
SA7: Services, Facilities and Education	0	0	+	++	+	0	0	0	0	0	++
SA8: Sustainable Travel	0	0	0	+	++	0	0	0	+	+	+?
SA9: Pollution	0	0	0	+	+	0	0	0	+	+	+?
SA10: Biodiversity and Geodiversity	0	0	0	0	0	++	0	0	0	0	0
SA11: Landscape	0	0	0	0	0	+	+	0	0	0	0
SA12: Cultural Heritage	0	0	0	0	0	0	++	++	0	0	0
SA13: Water	0	0	0	0	0	+	0	0	0	0	+?

SA Objective	Objective 1: Climate Change	Objective 2: Homes	Objective 3: Economy and Jobs	Objective 4: The Future of our Centres	Objective 5: Sustainable Transport and Communications	Objective 6: Natural Environment	Objective 7: History and Heritage	Objective 8: Culture and Tourism	Objective 9: High Quality Places and Design	Objective 10: Health and Wellbeing	Objective 11: Infrastructure and Facilities
SA14: Resources	0	0	0	0	0	0	0	0	0	0	0

Climate Change

6.8 The first objective of the Exeter Plan states that the Plan will make the fullest possible contribution to the mitigation of, and adaption to, climate change and work towards a net zero carbon city. Therefore, a significant positive effect is expected in relation to SA Objective 1: Climate Change. The objective is also expected to have a minor positive effect on SA Objective 3: Economic Growth as the aims of the objective will help promote the achievement of a low carbon economy.

Homes

6.9 The second objective of the Exeter Plan states that the Plan will provide the quantity, type, quality and affordability of homes that Exeter needs. Therefore, a significant positive effect is expected in relation to SA Objective 2: Housing. Potential but uncertain minor positive effects are expected for SA Objective 5: Design and the Built Environment and SA Objective 6: Community, as the objective supports the delivery of high quality housing including affordable homes in the right locations, which should support the delivery of cohesive and integrated neighbourhoods with visually attractive housing development, although this is uncertain.

Economy and Jobs

6.10 The third Exeter Plan objective outlines that the Plan will develop the potential for economic growth in the city, with a focus on the knowledge economy and delivering jobs, skills and training to all. Therefore, a significant positive effect is expected in relation to SA Objective 3: Economic Growth as the objective supports sustainable and diverse growth in the city and the creation of employment opportunities. A minor positive effect is expected in relation to SA Objective 7: Services, Facilities and Education as training will help with skills development.

The Future of our Centres

6.11 The fourth Exeter Plan objective relates to the future of our centres and sets out that the Plan aims to enhance the vitality of the city, district and local centres, supporting communities, prosperity and cultural identity. Therefore, a significant positive effect is expected in relation to SA Objective 3: Economic Growth as the objective supports the viability of Exeter's city, district and local centres. Significant positive effects are also expected in relation to SA Objective 6: Community and SA Objective 7: Services, Facilities and Education as the promotion of the city, district and local centres should improve local access to services, facilities and employment areas, deliver benefits to existing and new residents, and encourage the development of cohesive neighbourhoods with opportunity for outdoor/informal interaction. A minor positive effect is likely for SA Objective 8: Sustainable Travel as improved local centres will encourage short journeys to reach services and facilities, reducing reliance on private vehicles. This will have the effect of helping to minimise pollution associated with use of the private car. For this reason, a minor positive effect is also expected in relation to SA Objective 9: Pollution.

Sustainable Transport and Communications

6.12 The fifth objective sets out that the Plan will deliver development in appropriate locations and with the infrastructure needed to minimise travel, maximise sustainable transport and support emerging forms of mobility. As such, a significant positive effect is expected in relation to SA Objective 8: Sustainable Travel. High quality infrastructure will improve local access to services and facilities, in addition to encouraging economic growth. Therefore, minor positive effects are expected for SA Objective 3: Economic Growth and SA Objective 7: Services, Facilities and Education. Encouraging more sustainable travel, including walking, cycling and use of public transport will reduce reliance on private cars and associated pollution. Therefore, a minor positive effect is expected in relation to SA Objective 9: Pollution. Minor positive effects are also expected in relation to SA Objective 4: Health and SA Objective 6: Community as increased use of active travel modes is likely to have

beneficial effects on people's health and wellbeing, in addition to increasing pedestrian activity and outdoor interactions between people. Lastly, a minor positive effect is expected against SA Objective 1: Climate Change because the objective refers to supporting net zero.

Natural Environment

6.13 The sixth objective, Natural Environment, outlines how the Plan aims to protect and enhance the city's natural setting, as well as improve, extend and connect natural greenspaces and deliver net gains in biodiversity. Therefore, a significant positive effect is expected against SA Objective 10: Biodiversity and Geodiversity as it promotes the conservation and enhancement of ecological networks and delivering biodiversity net gain. A minor positive effect is expected in relation to SA Objective 11: Landscape as the objective seeks to protect and enhance the landscapes that define Exeter, specifically its hills, valley parks and the River Exe. Due to the fact that the objective supports the protection and enhancement of the River Exe, a minor positive effect is also expected for SA Objective 13: Water.

History and Heritage

6.14 The seventh Exeter Plan objective focuses on the protection and enhancement of the city's historic character. This is expected to deliver significant positive effects in relation to SA Objective 12: Cultural Heritage. It is also likely to result in minor positive effects against SA Objective 5: Design and the Built Environment and SA Objective 11: Landscape, as the objective supports development that complements and celebrates the city's heritage, identity and culture. This should result in development that respects the historic townscape and landscape of Exeter.

Culture and Tourism

6.15 Objective eight of the Exeter Plan supports the enhancement, exploration and celebration of the city's cultural richness and its profile as a tourist destination. This will likely support a diverse range of jobs and businesses in the city, and promotes the vitality and viability of the city centre by attracting visitors and footfall, resulting in a significant positive effect against SA Objective 3: Economic Growth. A minor positive effect is expected against SA Objective 4: Health as there are proven links between access to cultural and creative activities and improvements to the health and wellbeing of communities, particularly in relation to mental health. The objective provides high level support for proposals that enhance and reflect Exeter's cultural offering. The objective is also expected to have a significant positive effect in relation to SA Objective 12: Cultural Heritage because it seeks to promote the city's cultural richness, which could include designated and non-designated heritage assets, although this is uncertain.

High Quality Places and Design

6.16 Objective nine of the Exeter Plan aims to deliver high quality, liveable and connected places. This objective provides a high level of support for good quality design and well-connected neighbourhoods. As such, significant positive effects are expected against SA Objective 5: Design and the Built Environment and SA Objective 6: Community. Minor positive effects are also likely against SA Objective 4: Health and SA Objective 8: Sustainable Travel as well-connected and liveable places should deliver a high quality public realm and local environments, and reduce the need to travel by private vehicle by ensuring good walking, cycling and public transport connectivity. This will help minimise pollution associated with use of the private car and therefore a minor positive effect is also expected in relation to SA Objective 9: Pollution. Like some of the other objectives, this one also refers to a push towards net zero and therefore a minor positive effect is also expected against SA Objective 1: Climate Change.

Health and Wellbeing

6.17 The tenth Exeter Plan objective promotes inclusive development which supports the health of communities, and aims to make Exeter the most active city in the UK. Therefore, a significant positive effect is expected against SA Objective 4: Health. Promoting health and activity should include active travel opportunities. Therefore, minor positive effects are expected against SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as increased opportunity for walking and cycling should reduce reliance on private vehicles and associated pollution.

Infrastructure and Facilities

6.18 The final Exeter Plan objective focuses on the delivery of new infrastructure for residents, appropriate locations for new facilities and the protection of existing services. As such, this is expected to result in significant positive effects for SA Objective 6: Community and SA Objective 7: Services, Facilities and Education. Minor positive effects are likely in relation to SA Objective 1: Climate Change and SA Objective 3: Economic Growth because delivering infrastructure, as outlined by this objective, would help to support success of the local economy and achieving net zero. The objective seeks to promote active and healthy lifestyles, in addition to potentially supporting the delivery of healthcare. Therefore, a minor positive effect is expected against SA Objective 4: Health.

6.19 Potential but uncertain minor positive effects are identified for SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as suitable locations for infrastructure and facilities should support walking and cycling to meet community needs, and reduce reliance on private vehicles which may also reduce pollution, although this is not specified in the objective. A minor positive but uncertain effect is also expected for SA Objective 13: Water because infrastructure delivery is likely to include water management and storage, which will help protect water quality and also improve efficiency, although not specified in the objective.

6.20 It is noted that none of the objectives explicitly address SA Objective 14: Resources and therefore no effects on this objective have been identified.

Spatial Strategy

6.21 This section presents the appraisals of the following Exeter Plan Policies:

- Policy S1: Spatial Strategy (Strategic Policy)
- Policy S2: Liveable Exeter Principles (Strategic Policy)

6.22 In terms of reasonable alternatives, the likely effects of the alternative options to Policy S1 were presented in Chapter 4.

6.23 Policy S1 takes forward Option A from the suite of options considered and appraised in Chapter 4. This was considered by the Council to be the most sustainable approach to accommodating the required level of development in Exeter. The Council considers that this approach minimises the worst impacts and maximises the potential benefits, which is reflected in the SA by the fact that it performed the best of the four options considered. However, the likely effects of Policy S1 vary slightly from those associated with Option A as the Policy now includes additional detail which has been taken into account in the appraisal presented below.

6.24 The likely effects of the policies in relation to each SA objective are shown in Table 6.2 and described below the table.

Table 6.2: Summary of SA findings for the Spatial Strategy Policies

SA Objectives	Policy S1	Policy S2
SA1: Climate Change	+/-?	+

SA Objectives	Policy S1	Policy S2
SA2: Housing	++	+?
SA3: Economic Growth	++	+?
SA4: Health	+	++
SA5: Design and the Built Environment	+?	++
SA6: Community	+	++
SA7: Services, Facilities and Education	+	+?
SA8: Sustainable Travel	++	+?
SA9: Pollution	+/-?	+?
SA10: Biodiversity and Geodiversity	+/-?	+/-?
SA11: Landscape	+/-?	+/-?
SA12: Cultural Heritage	+/-?	+/-?
SA13: Water	-?	+/-?
SA14: Resources	+/-?	+/-?

Policy S1: Spatial Strategy (Strategic Policy)

6.25 Minor positive effects are identified in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution, as the Policy supports proposals that are located close to key public transport hubs with good access to green infrastructure and so is likely to increase opportunities to access sustainable transport links thereby reducing congestion and pollution, and most development would be located within already developed areas thereby avoiding significant changes to residential amenity. However, the Policy is also likely to have a minor negative effect on these objectives (resulting in mixed effects overall) as new development is likely to cause increased congestion in the City,

contributing to pollution and the effects of climate change, particularly as the majority of commuters outside the City travel by car.

6.26 The Policy will deliver housing and employment land within the City, which will provide a range of housing types and employment opportunities for residents. The Policy also supports the delivery of mixed use development. The Policy is therefore likely to have significant positive effects on SA Objective 2: Housing and SA Objective 3: Economic Growth, as it expected to accommodate the scale and mix of development required. The Policy states that proposals must provide enough good quality homes of a variety of types in the Exeter City Council area to meet Exeter's needs and should bring forward new forms of employment provision in the city and work with neighbouring Councils to ensure the employment needs of the wider functional economic market area are met. The Policy also ensures that the employment needs of the wider functional area are met and supports improving education and skill provisions. Significant positive effects are therefore likely on SA objectives 2 and 3.

6.27 The Policy directs development towards strategic brownfield sites particularly in locations close to the city centre and promotes access to public transport hubs. This is likely to provide opportunities to ensure good access to healthcare, services, facilities and education, and also support community cohesion and safety. The Policy seeks new development located near enough to key services and facilities to allow residents to make most of their daily needs easily on foot. The Policy also requires proposals to deliver the range of infrastructure and services needed to support high quality development and the City's communities in a timely manner. Therefore, minor positive effects are identified in relation to SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education.

6.28 A minor positive effect is identified in relation to SA Objective 5: Design and the Built Environment, as the Policy will direct development towards previously developed land which is likely to contribute to improving the existing built environment of the City. Design of the development should reflect local identities, integrating with the existing townscape, whilst still providing for diverse neighbourhoods and delivering high quality public spaces. The effect

identified is uncertain as it will be dependent on the exact location and design of new development.

6.29 The majority of Exeter residents travel to work by sustainable modes, and residents currently still represent the largest part of the City's labour pool. The Policy is expected to continue to support reducing the need to travel by private vehicle and encourage the use of sustainable modes due to the proximity and access of likely development locations within the City and the focus on 20-minute return journeys on foot. The Policy focuses development in locations close to public transport hubs and routes and seeks to maximise active travel. The Policy requires proposals to focus the majority of development on large, strategic brownfield sites, particularly in locations close to the city centre with good access to green infrastructure and promotes access to public transport hubs. Therefore, a significant positive effect is identified in relation to SA Objective 8: Sustainable Travel.

6.30 Exeter contains a rich variety of wildlife habits including European and National designations. The Policy is expected to have some negative environmental effects as it will likely require some land take on greenfield land; however the majority of development will be located on brownfield land. The policy also requires development to avoid impacts on ecology, which could cause habitat loss and impact sensitive landscapes. In addition, new development can likely increase congestion and reduce air quality levels. Poor air quality can have a negative effect on wildlife and the natural environment. Although the Policy focuses most development on brownfield sites which generally have lower biodiversity value, some development would still occur on greenfield land and it is also recognised that brownfield sites may still harbour valuable biodiversity. In terms of the historic environment, a minor negative effect is also identified in relation to SA Objective 12: Cultural Heritage as there is potential for development to have adverse impacts on the setting of heritage assets. The Policy does support the protection and enhancement of biodiversity throughout the city. It also seeks to protect the ecological value of the River Exe, wildlife networks and the landscape value of sensitive hills and conserve and enhance the historic environment. Therefore, mixed effects (minor negative and minor positive) are expected overall against SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA

Objective 12: Cultural Heritage. There is a degree of uncertainty for the identified effects for biodiversity and geodiversity, landscape and heritage, as effects will be dependent on the exact scale, location and design of any development and any mitigation or enhancement measures included. It is also noted that the Policy requires proposals to protect the sensitive Exe Estuary and the sensitive hills to the north and north-west of the city.

6.31 A minor negative effect is likely in relation to SA Objective 13: Water as, while the Policy aims to steer development to avoid areas of higher flood risk where possible, it could still result in development within areas of higher flood risk. The effect identified is uncertain as it will be dependent on the exact location of new development and the proposals for how any residual flood risk is managed, for example the incorporation of SuDS within new developments. The Policy also requires proposals to manage residual flood risk as appropriate.

6.32 The majority of land within Exeter is classed as being in Urban Use with small areas designated as higher agricultural land classification (ALC). There are small bands of land to the north designated as Grade 3 ALC and areas to the south-east designated as Grades 1 and 2. A minor positive effect is identified in relation to SA Objective 14: Resources as the Policy requires most development to be directed to large, strategic brownfield sites. However, a minor negative effect is also identified as the Policy also permits modest greenfield development as a supplement to brownfield development. The mixed effect is uncertain as it will be dependent on the exact location of new development.

Policy S2: Liveable Exeter Principles (Strategic Policy)

6.33 The likely effects of Policy S2 are broadly very positive, as the Policy seeks to ensure that new strategic developments are high quality and contribute to the Liveable Exeter Principles. Significant positive effects are likely in relation to SA Objective 4: Health, SA Objective 5: Design and the Built Environment and SA Objective 6: Community as the Policy directly seeks to improve the

quality of the built environment, creating welcoming neighbourhoods and healthy communities. It also encourages walking and cycling by delivering green infrastructure, making efficient use of land so that Exeter remains compact and walkable. Development is also required to incorporate the Healthy Streets design where appropriate. Mean-while use is encouraged to ensure that where development is taking place, the area may still be of use to the community during the time period.

6.34 Potential but uncertain minor positive effects are also identified in relation to SA Objective 1: Climate Change, SA Objective 2: Housing, SA Objective 3: Economic Growth, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. The Policy criteria should ensure that any new large-scale developments are high quality which will benefit the overall quality of housing delivered in Exeter and should also benefit the economy by improving the quality of employment premises and enabling more people to live and work in the City. It is assumed that part of creating high quality and healthy developments will be the provision of green infrastructure, which will benefit climate change and may help to encourage walking and cycling in place of car use, as will the creation of safe streets and the incorporation of passive surveillance measures. The Policy also requires development to be adaptable and resilient to the effects of climate change, as well as requiring development to incorporate innovative solutions for buildings, transport provision, energy and other infrastructure to achieve a net-zero city. The Policy promotes creative industries and flexible spaces for economic growth and to support emerging diverse business practices, boosting the resilience of the area's economy, while supporting the provision of a wide range of accessible, local jobs and the education and skills provision to link employment and learning.

6.35 A minor positive effect is likely in relation to SA Objective 7: Services, Facilities and Education, as the Policy requires developments to provide the education and skills to support local employment and to support thriving high streets, district and local centres, and create new centres where appropriate, delivering local shops, open spaces, community, education and health facilities.

6.36 The likely effects of the Policy on SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape, SA Objective 12: Cultural Heritage,

SA Objective 13: Water and SA Objective 14: Resources are mixed and uncertain as new strategic development has the potential for negative effects on these environmental SA objectives, although the measures in the Policy should provide some mitigation including potentially even benefits. While effects will depend largely on the location of any large-scale sites that come forward, supporting the delivery of high-quality development on strategic mixed-use brownfield sites will help to avoid the loss of greenfield land including potentially high quality agricultural soils. In addition, the Policy requires development to enhance Exeter's natural, built and historic environment, deliver green infrastructure, create greener places and maximise opportunities for landscaping and planting, as well as incorporate stewardship measures for environmental assets. The Policy also ensures development incorporates innovative solutions for sustainable waste management.

Reasonable Alternatives

6.37 No reasonable alternatives have been considered in relation to Policy S2: Liveable Exeter Principles.

Climate Change

6.38 This section presents the appraisals of the following Exeter Plan policies, as well as the reasonable alternative options considered:

- Policy CC1: Net Zero Exeter (Strategic Policy)
- Policy CC2: Renewable and Low Carbon Energy (Strategic Policy)
- Policy CC3: Local Energy Networks (Strategic Policy)
- Policy CC4: Ground-mounted Photovoltaic Arrays
- Policy CC5: Future Development Standards (Strategic Policy)
- Policy CC6: Embodied Carbon

- Policy CC7: Development that is Adaptive and Resilient to Climate Change
- Policy CC8: Flood Risk (Strategic Policy)
- Policy CC9: Water Quantity and Quality

6.39 The likely effects of the policies in relation to each SA objective are shown in Table 6.3 and described below the table. The likely effects of the reasonable alternative options considered for each Policy are also summarised below.

Table 6.3: Summary of SA findings for the Climate Change Policies

SA Objectives	Policy CC1	Policy CC2	Policy CC3	Policy CC4	Policy CC5	Policy CC6	Policy CC7	Policy CC8	Policy CC9
SA1: Climate Change	++	++	++	++	++	++	++	+	+
SA2: Housing	+	0	+	+	+	+	0	0	0
SA3: Economic Growth	+	+	+	+	-	+/-	0	0	0
SA4: Health	+	+	0	+	0	0	0	+	0
SA5: Design and the Built Environment	+	+	0	0	0	0	0	0	0
SA6: Community	0	+	0	0	0	0	0	0	0
SA7: Services, Facilities and Education	+?	0	0	0	0	0	0	0	0
SA8: Sustainable Travel	+	0	0	0	0	0	0	0	0
SA9: Pollution	+	+	0	+	+	+	+	+	+
SA10: Biodiversity and Geodiversity	+	+	0	0	0	0	+	0	++
SA11: Landscape	+	+	0	0	0	0	0	0	0
SA12: Cultural Heritage	+?	+	0	0	0	0	0	0	0
SA13: Water	+	0	0	0	0	0	+	++	++
SA14: Resources	0	0	0	++	0	0	0	0	++

Policy CC1: Net Zero Exeter (Strategic Policy)

6.40 Policy CC1: Net Zero Exeter is expected to have a significant positive effect in relation to SA Objective 1: Climate Change because it sets out how Exeter City Council will achieve net zero for the city by 2030, including promoting energy efficiency through the location and urban form of development, as well as applying a fabric first approach. The Policy seeks to maximise renewable energy generation, minimise operational and embodied carbon emissions and minimise travel by car, maximising walking, wheeling, cycling and use of public transport instead. Provision will be made for green infrastructure and the incorporation of SuDS may help mitigate flood risk associated with climate change. The Policy requires major development proposals to submit a Net Zero Statement setting out how development will address the requirements of the policy.

6.41 Applying the fabric first approach will help to maximise the energy efficiency of buildings and reduce heat loss. This could ensure that homes are more energy efficient, resulting in a minor positive effect for SA Objective 2: Housing. The Policy is expected to have a minor positive effect against SA Objective 3: Economic Growth because the requirements outlined in the Policy will help promote the achievement of a low carbon economy.

6.42 Minor positive effects are also expected in relation to SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because walking and cycling are sustainable modes of travel that encourage physical exercise with beneficial effects on people's health, in addition to helping reduce emissions associated with use of the private car, as well as noise. Minimising the need to travel and maximising the use of active travel modes and public transport could improve access to existing services and facilities for all. Therefore, a potential but uncertain minor positive effect is also expected in relation to SA Objective 7: Services, Facilities and Education.

6.43 Policy CC1 is also likely to have minor positive effects in relation to SA Objective 5: Design and the Built Environment and SA Objective 11: Landscape because it requires consideration to be given to the location and density of development, which will help ensure that any development is sympathetic to the character of the surrounding area. Further to this, the Policy makes provision for green infrastructure and landscape-led schemes, which will also help protect the landscape. Ensuring all development proposals are landscape-led should indirectly help protect the historic environment from inappropriate development. Therefore, a potential but uncertain minor positive effect is also identified in relation to SA Objective 12: Cultural Heritage.

6.44 A minor positive effect is expected in relation to SA Objective 10: Biodiversity and Geodiversity because in addition to supporting the provision of green infrastructure, the Policy also seeks to achieve biodiversity net gain and proposes the use of nature-based solutions. A minor positive effect is also expected in relation to SA Objective 13: Water because the Policy seeks to make use of SuDS and to deliver flood risk management.

6.45 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.46 There are two reasonable alternatives to Policy CC1: Net Zero Exeter that the Council has considered. They are:

- Reasonable Alternative 1: Less restrictive Policy that does not set out how new development will support the achievement of net zero – This option would not maximise the contribution new development can have to achieving net zero.
- Reasonable Alternative 2: More detailed Policy – More detailed Policy to look at other measure to support the achievement of new zero ambition - it was considered that additional policies were required, and these are presented separately below (see CC2, CC4, CC5, CC6, & CC7). This option has not been subject to SA as it is superseded by the inclusion of new policies which includes: CC2, CC4, CC5, CC6 and CC7.

6.47 As was the case with Policy CC1, Reasonable Alternative 1 seeks to achieve net zero carbon. However, the option would not set out the ways in which net zero carbon be achieved. Therefore, although a potential significant positive effect is expected in relation to SA Objective 1: Climate Change, it is uncertain and negligible effects are expected against the remaining SA objectives.

Policy CC2: Renewable and Low Carbon Energy (Strategic Policy)

6.48 Policy CC2: Renewable and Low Carbon Energy (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 1: Climate Change because it supports renewable and low carbon energy-generating development, and all related enabling infrastructure (including battery storage and other energy storage facilities). In addition, the Policy outlines that energy-generating development that is neither renewable nor low carbon will not be permitted. The Policy will reduce Exeter's emissions, helping the city to achieve net-zero and aid in mitigating climate change. In addition, a reduction in emissions would result in improved air quality in the City, resulting in minor positive effects against SA Objective 4: Health and SA Objective 9: Pollution.

6.49 The creation of renewable and low carbon energy-generating development will aid in diversifying the City's economy as well as promote the achievement of a low carbon economy. Therefore, a minor positive effect is identified for the Policy in relation to SA Objective 3: Economic growth.

6.50 The Policy requires that proposals for renewable and low carbon energy-generating development, and all related enabling infrastructure to avoid unacceptable impacts upon amenity and the natural, historic and built environment. In addition, the Policy outlines that clear evidence of local community involvement and leadership will be given substantial positive weight. These requirements will improve the design of developments, ensuring they are appropriate and do not harm the landscape, historic environment, natural

environment or communities. Minor positive effects are therefore expected for SA Objective 5: Design and the Built Environment, SA Objective 6: Community, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage.

6.51 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.52 There are two reasonable alternatives to Policy CC2: Renewable and Low Carbon Energy (strategic Policy):

- Reasonable Alternative 1: Less restrictive Policy that does not rule out energy-generating development that is neither renewable nor low carbon – This option would not support the achievement of the net zero ambition.
- Reasonable Alternative 2: More detailed Policy to look at standards of operational energy and embodied carbon – It was considered that additional policies were required, and these are presented separately below (CC5 & CC6). This option has not been subject to SA as it is superseded by the inclusion of new policies which includes: CC5 and CC6.

6.53 Reasonable Alternative 1 would support renewable and low carbon energy to a lesser extent than Policy CC2; however despite this, a significant positive effect is still expected in relation to SA Objective 1: Climate change as Reasonable Alternative 1 would still support the development of renewable and low carbon energy. A reduction in emissions would result in improved air quality in the City, resulting in minor positive effects against SA Objective 4: Health and SA Objective 9: Pollution. In addition, a minor positive effect is identified for SA Objective 3: Economic growth due to the reasons outlined in relation to Policy CC2. A less restrictive Policy would likely have less protections regarding amenity and the natural, historic and built environment, and would likely not include as much evidence of local community involvement and leadership, therefore minor negative effects are expected in relation to SA Objective 5: Design and the Built Environment, SA Objective 6: Community, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA

Objective 12: Cultural Heritage. Negligible effects are expected against the remaining SA objectives.

Policy CC3: Local Energy Networks (Strategic Policy)

6.54 Policy CC3: Local Energy Networks (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 1: Climate Change because it proposes a number of new local energy networks, which are low-carbon and therefore key to achieving net zero.

6.55 A minor positive effect is expected in relation to SA Objective 3: Economic Growth because supporting local energy networks will help to promote the achievement of a low carbon energy. The policy also requires developments of 10 or more homes to be constructed to have heating systems compatible with proposed or local energy networks. Therefore, a minor positive effect is expected in relation to SA Objective 2: Housing as the policy will contribute to the overall quality of new housing.

6.56 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.57 There are two reasonable alternatives to Policy CC3: Local Energy Networks (Strategic Policy). They are:

- Reasonable Alternative 1: Less restrictive Policy that does not require new development to be built to allow connection to energy networks – This option would not maximise the contribution of new development in achieving net zero.
- Reasonable Alternative 2: Different areas – The areas listed in the Policy are where the evidence suggests local energy networks could be

delivered. Alternative areas could be selected although these would not be supported by evidence. Alternative areas could be selected although these would not be supported by evidence.

6.58 Reasonable Alternative 1, like Policy CC3, identifies areas where local energy networks will be delivered. However, this option does not require new development to be built in a way that connects to the local energy networks, which may undermine their delivery. Therefore, a mixed significant positive and minor negative effect is expected in relation to SA Objective 1: Climate Change. Negligible effects are expected against the remaining SA objectives.

6.59 Reasonable Alternative 2 is expected to have a mixed significant positive and minor negative but uncertain effect in relation to SA Objective 1: Climate Change because although this option supports local energy networks, the areas identified for delivery of the local energy networks may not be suitable and could undermine the policy's intention.

6.60 A minor positive but uncertain effect would be expected in relation to SA Objective 3: Economic Growth because, although the Policy would require all new development to connect to a the local energy network, the local energy networks may not be delivered if the location is considered unsuitable. Negligible effects are expected against the remaining SA objectives.

Policy CC4: Ground-mounted Photovoltaic Arrays

6.61 Policy CC4: Ground-mounted Photovoltaic Arrays is expected to have a significant positive effect in relation to SA Objective 1: Climate Change as it supports proposals for ground-mounted solar arrays. The Policy therefore will reduce Exeter's emissions, helping the city to achieve net-zero and aid in mitigating climate change. A reduction in emissions would result in improved air quality, resulting in a minor positive effect against SA Objective 9: Pollution. In addition, the Policy outlines that development of ground-mounted photovoltaic

arrays will not be supported if they result in the loss of public access, open space, areas of recreation, nor harm the potential opportunities for these functions, therefore a minor positive effect is identified in relation to SA Objective 4: Health.

6.62 A significant positive effect is identified in relation to SA Objective 14: Resources as proposals for ground-mounted photovoltaic arrays will be supported if they are sited on previously developed land or agricultural land of classification 3b, 4 and 5. This would result in avoiding development on higher quality agricultural land.

6.63 The development of ground-mounted photovoltaic arrays will aid in diversifying the City's economy as well as promote the achievement of a low carbon economy. The policy could also ensure that new homes have access to renewable energy sources and are more energy efficient. Therefore, minor positive effects are identified for the Policy in relation to SA Objective 2: Housing and SA Objective 3: Economic growth.

6.64 Photovoltaic arrays panels have the potential to have a negative impact on the landscape and setting if they are not sited appropriately. The Policy requires the development of ground-mounted photovoltaic arrays to minimise visual impacts, including cumulative impacts, on the landscape and protect the setting of heritage assets. Therefore, negligible effects are expected in relation to SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage. The Policy also requires that the development of ground-mounted photovoltaic arrays that avoids adverse effects on the European Wildlife Sites and addresses any other biodiversity impacts.

6.65 A negligible effect is identified in relation to SA Objective 13: Water as proposals for ground-mounted photovoltaic arrays will be supported if they avoid areas of high flood risk. This will aid in the mitigation of flood risk in Exeter. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.66 There are two reasonable alternatives to Policy CC4: Ground-mounted Photovoltaic Arrays:

- Reasonable Alternative 1: Less restrictive Policy that does not require all the criteria to be met – This would result in harm to the natural, historic and built environment.
- Reasonable Alternative 2: A Policy identifying areas for ground-mounted photovoltaic arrays – The evidence to allow the allocation of sites is not available and the cost of obtaining such evidence would be high and not a good use of public funding. As this is a commercial operation the costs of identifying a suitable site should therefore be borne by the operator and indeed the operator is best placed to do this work.

6.67 Reasonable Alternative 1 is a less restrictive Policy that does not require all the criteria to be met. This would enable easier development of ground-mounted photovoltaic arrays, resulting in significant positive effects for SA Objective 1: Climate Change, SA Objective 2: Housing, SA Objective 3: Economic Growth and SA Objective 9: Pollution for the reasons outlined for Policy CC4. However, as Reasonable Alternative 1 would be less restrictive, significant negative effects with uncertainty are identified in relation to SA Objective 14: Resources, SA Objective 10: Biodiversity, SA Objective 11: Landscape, SA Objective 12: Cultural Heritage and SA Objective 13: Water as these areas are less likely to be protected from harm. Mixed minor positive and minor negative effects are identified in relation to SA Objective 4: Health as a decrease in emissions will improve air quality and related health impacts, however Reasonable Alternative 1 would remove protections for public access, open space and areas of recreation, harming the ability of Exeter residents to have active and healthy lifestyles. Negligible effects are expected against the remaining SA objectives.

6.68 Reasonable Alternative 2 would still support the development of Ground-mounted photovoltaic arrays, though this would be to a greater extent than

Policy CC4 as allocating land for development would further encourage and enable the development of ground-mounted photovoltaic arrays, and ensure that land is protected for that use. Therefore, significant positive effects continue to be identified in relation to SA Objective 1: Climate Change, SA Objective 4: Health and SA Objective 14: Resources. Negligible effects are expected against the remaining SA objectives.

Policy CC5: Future Development Standards (Strategic Policy)

6.69 Policy CC5: Future Development Standards (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 1: Climate Change as the Policy directly supports the reduction of Exeter's CO₂ emissions associated with domestic and non-domestic properties. This includes a requirement for non-domestic buildings to achieve heating using a heat pump or heat network and solar PV panel coverage from 2025. The Policy will also help reduce air pollution by mitigating carbon dioxide emissions, therefore a minor positive effect is expected in relation to SA Objective 9: Pollution.

6.70 A minor positive is expected in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth. The introduction of carbon dioxide reduction targets in the process of residential and commercial development could deliver more energy efficient homes and businesses, enhancing the quality of these types of buildings. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.71 There are two reasonable alternatives to Policy CC5: Future Development Standards (Strategic Policy) which have been considered:

- Reasonable Alternative 1: Less restrictive Policy – This option would not support the achievement of the net zero ambition (the Policy ensures the

Government's commitment to cutting operation emissions will deliver according to trajectory).

- Reasonable Alternative 2: A more restrictive Policy – Once the Government introduces the 'Future Homes Standard' and the 'Future Buildings Standard' in 2025 and the operational carbon emissions will amount to only 3% of the overall carbon emissions for a new build. Seeking any further reduction would conflict with Government guidance, but more importantly not be an efficient use of resources (the Council's; in terms of the evidence required to justify such an approach when compared with other approaches, or the developers; as far greater returns, in terms of carbon savings, can be achieved through focusing on non-operational carbon).; the focus needs to be on reducing embodied carbon (see Policy CC6).

6.72 Reasonable Alternative 1 would be a less restrictive Policy but still support the aim of net zero carbon to a lesser extent than Policy CC5. Therefore, minor positive effects are expected in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution as the Policy would still result in a decrease in emissions, and therefore improvement in air quality. Negligible effects are expected against the remaining SA objectives.

6.73 Reasonable Alternative 2 would support the aim of net zero carbon to a greater extent than Policy CC5. Therefore, significant positive effects would be expected in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution. However, a more restrictive Policy may have a greater impact on the ability to supply an appropriate quantity of housing and employment development to satisfy demand. Therefore, significant negative effects are identified in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth. Negligible effects are expected against the remaining SA objectives.

Policy CC6: Embodied Carbon

6.74 Policy CC6: Embodied Carbon is expected to have a significant positive effect in relation to SA Objective 1: Climate Change as the Policy will result in a

reduction of Exeter's carbon dioxide emissions, aiding in reaching net-zero and mitigating climate change. The Policy should also reduce air pollution, therefore a minor positive effect is expected in relation to SA Objective 9: Pollution.

6.75 A minor positive effect is expected in relation to SA Objective 2: Housing as the introduction of the requirements outlined in the Policy could support the delivery of more energy efficient homes.

6.76 A minor positive effect is expected in relation to SA Objective 3: Economic Growth as considering embodied carbon in the product and construction stages of development will aid in the achievement of a low carbon economy.

6.77 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.78 There are two reasonable alternatives to Policy CC6: Embodied Carbon which have been considered:

- Reasonable Alternative 1: Less restrictive Policy – This option would not support the achievement of the net zero ambition.
- Reasonable Alternative 2: More restrictive Policy – This option is not currently supported by the evidence, but the Policy will be reviewed in the light of emerging work being carried out by Homes England and the Government (together with internal work on viability).

6.79 Reasonable Alternative 1 would support the aim of net zero carbon to a lesser extent than Policy CC6 as it would likely require less requirements to reduce embodied carbon emissions. Therefore, a minor positive effect is identified in relation to SA Objective 1: Climate Change. An uncertain minor negative effect is identified in relation to SA Objective 2: Housing, as Reasonable Alternative 1 would still introduce requirements which may impact the ability of the city to supply an appropriate quantity of housing to satisfy demand. In line with Policy CC6, an uncertain mixed minor positive and minor

negative effect is expected in relation to SA Objective 3: Economic Growth. Negligible effects are expected against the remaining SA objectives.

6.80 Reasonable Alternative 2 would support the aim of net zero carbon to a greater extent than Policy CC6 as it would likely require more requirements to reduce embodied carbon emissions. Therefore, a significant positive effect is expected in relation to SA Objective 1: Climate Change. A significant negative effect is expected in relation to SA Objective 2: Housing as the introduction of more restrictive requirements, will further impact the ability of the city to supply an appropriate quantity of housing to satisfy demand. A mixed minor positive and minor negative effect is expected in relation to SA Objective 3: Economic Growth as considering embodied carbon in development will aid in the achievement of a low carbon economy, however these requirements may impact the ability to supply an appropriate quantity of employment development to satisfy demand. Negligible effects are expected against the remaining SA objectives.

Policy CC7: Development that is Adaptive and Resilient to Climate Change

6.81 Policy CC7: Development that is Adaptive and Resilient to Climate Change is expected to have a significant positive effect in relation to SA Objective 1: Climate Change as it requires development proposals to demonstrate how they will adapt to a changing climate and remain resilient over their lifetimes. This will aid in improving Exeter's climate resilience. A minor positive effect is expected in relation to SA Objective 9: Pollution as improving Exeter's climate resilience could support a reduction in emissions. The Policy requires development proposals to demonstrate reducing overheating, reducing flood risk, adapting to reduce water availability, integrating biodiversity and retrofitting renewable energy technologies. Therefore, minor positive effects are expected in relation to SA Objective 10: Biodiversity and SA Objective 13: Water.

6.82 Overall negligible effects are expected in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth as the requirements of the

Policy are considered unlikely to have a measurable impact on the delivery of new development and would ensure that new built development is of high quality and resilient to climate change. Negligible effects are also expected against the remaining SA objectives.

Reasonable Alternatives

6.83 There is one reasonable alternative to Policy CC7: Development that is Adaptive and Resilient to Climate Change which has been considered:

- Reasonable Alternative 1: More restrictive Policy – The Policy should not conflict with other legislation covering adaptation and resilience and should not go beyond the ‘Future Homes Standard’ and the ‘Future Buildings Standard’. Flexibility is needed to account for site specific factors.

6.84 Reasonable Alternative 1 could result in an even more significant positive effect is expected in relation to SA Objective 1: Climate Change as the introduction of a more restrictive Policy would support adaptation to the changing climate and ensure developments remain resilient to the effects of climate change. Negligible effects are expected in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth as the Policy will ensure buildings are developed to be resilient to climate change which will help to maintain their longevity.

Policy CC8: Flood Risk (Strategic Policy)

6.85 Policy CC8: Flood Risk (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 13: Water because development will only be permitted where it is demonstrated that the proposal satisfies the sequential test and, where appropriate, the exceptions test. Further to this, development in Flood Zone 3 will only be permitted where it also contributes to reducing the overall flood risk. Adherence to the drainage hierarchy and the use of Sustainable Drainage Systems is encouraged by the policy, which will help mitigate flood risk at the same time as protecting water quality. For these

reasons, a minor positive effect is also expected in relation to SA Objective 1: Climate Change. Reducing the risk of flooding could also reduce the potential for pollution of Exeter's water environment. Therefore, a minor positive effect is expected in relation to SA Objective 9: Pollution. Mitigating flood risk is also expected to help protect people's health and wellbeing and therefore a minor positive effect is also expected against SA Objective 4: Health.

6.86 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.87 One reasonable alternative has been considered by the Council in relation to Policy CC8: Flood Risk (Strategic Policy):

- Reasonable Alternative 1: More restrictive Policy – This option would not allow for the delivery of a sufficient supply of homes as required by the NPPF.

6.88 While Reasonable Alternative 1 would seek to mitigate flood risk, resulting in a significant positive effect against SA Objective 13: Water and minor positive effects against SA Objective 1: Climate Change and SA Objective 4: Health, this option would not allow for the delivery of a sufficient supply of homes, as required by the NPPF. Therefore, a significant negative effect is expected in relation to SA Objective 2: Housing. This could also lead to minor negative effects on SA Objective 8: Sustainable Transport and SA Objective 9: Pollution as levels of car use may be higher, as people need to travel longer distances between their homes and workplaces. Negligible effects are expected against the remaining SA objectives.

Policy CC9: Water Quantity and Quality

6.89 Policy CC9: Water Quantity and Quality is expected to have a significant positive effect in relation to SA Objective 13: Water as the Policy supports

improving water efficiency and the improvement of the ecological status of water bodies, including requiring that proposals that harm the ecological status of any water bodies will not be supported. This will help to protect biodiversity, particularly aquatic habitats, resulting in a significant positive effect against SA Objective 10: Biodiversity and Geodiversity. In addition, these Policy requirements will likely result in a reduction of water pollution, resulting in a minor positive effect against SA Objective 9: Pollution.

6.90 A significant positive effect is expected in relation to SA Objective 14: Resources as the Policy requires that all new residential development must achieve as a minimum water efficiency that requires an estimated water use of no more than 110 litres per person per day.

6.91 The Policy is also expected to have a minor positive effect in relation to SA Objective 1: Climate Change as the requirements for water efficiency and Drainage and Wastewater Management Plan and the Storm Overflow Action Plan will help Exeter adapt to climate change, including increasing droughts and flood events.

6.92 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.93 There are three reasonable alternatives to Policy CC9: Water Quantity and Quality:

- Reasonable Alternative 1: Less restrictive Policy that doesn't require the higher options building regulations target of 110 litres – This option would not mitigate and adapt to climate change and would not help to address the water shortages occurring in the south-west.
- Reasonable Alternative 2: Less restrictive Policy that doesn't require contributions to help deliver the Drainage and Wastewater Management Plan – This option could result in unacceptable hydrological impacts on the European sites.

- Reasonable Alternative 3: More restrictive Policy – The 110 litre target is currently the highest optional building regulations target.

6.94 Reasonable Alternative 1 would provide some improvements in water quantity protection and climate change adaptation but this is not expected to be significant. Therefore, negligible effects are expected in relation to SA Objective 1: Climate Change and SA Objective 14: Resources as Reasonable Alternative 1 will not result in the efficient use of water and not supporting climate change adaption. A minor positive effect would be expected in relation to SA Objective 13: Water as the Policy would still support the improvement of the ecological status of water bodies, including requiring proposals that harm the ecological status of any water bodies will not be supported. A significant positive effect would still be expected in relation to SA Objective 10: Biodiversity and Geodiversity. Reasonable Alternative 1 would still likely result in a reduction of water pollution, resulting in a minor positive effect against SA Objective 9: Pollution. A minor negative effect would be expected in relation to SA Objective 2: Housing as while they are less restrictive, the requirements outlined in Reasonable Alternative 1 may still impact the ability of to supply an appropriate quantity of housing to satisfy demand. Negligible effects are expected against the remaining SA objectives.

6.95 Reasonable Alternative 2 requires a less restrictive Policy that doesn't require contributions to help deliver the Drainage and Wastewater Management Plan. This could lead to negative impacts on water quality due to poor drainage and wastewater. Therefore, a significant negative effect is expected in relation to SA Objective 13: Water. Not requiring the delivery of a Drainage and Wastewater Management Plan could result in unacceptable hydrological impacts on European Sites resulting in a significant negative effect against SA Objective 10: Biodiversity and Geodiversity. Reasonable Alternative 2 could also result in higher levels of pollution from wastewater resulting in a significant negative effect against SA Objective 9: Pollution. A significant positive effect is expected in relation to SA Objective 14: Resources as the Policy requires that all new residential development must achieve as a minimum water efficiency that requires an estimated water use of no more than 110 litres per person per day. A minor negative effect would be expected in relation to SA Objective 2: Housing as while they are less restrictive, the requirements outlined in

Reasonable Alternative 2 may still impact the ability of to supply an appropriate quantity of housing to satisfy demand. A negligible effect would be expected in relation to SA Objective 1: Climate Change as the requirements for water efficiency and Drainage and Wastewater Management Plan in Policy CC9 would help Exeter adapt to climate change, and these are not included in Reasonable Alternative 2. Negligible effects are expected against the remaining SA objectives.

6.96 Reasonable Alternative 3 would involve a more restrictive Policy requiring 110 litre target as the highest optional building regulations target. A significant positive effect would be identified in relation to SA Objective 13: Water and SA Objective 10: Biodiversity and Geodiversity as Reasonable Alternative 3 would support improving water efficiency and the improvement of the ecological status of water bodies. In addition, these more restrictive requirements will likely result in a greater reduction of water pollution, resulting in a significant positive effect against SA Objective 9: Pollution. A significant positive effect is expected in relation to SA Objective 14: Resources as Reasonable Alternative 3 would result in greater water efficiency. A minor positive effect would still be expected in relation to SA Objective 1: Climate Change. A minor negative effect would be expected in relation to SA Objective 2: Housing as Reasonable alternative 3 may impact upon the ability to supply an appropriate quantity of housing to satisfy demand. Negligible effects are expected against the remaining SA objectives.

Homes

6.97 This section presents the appraisals of the following Exeter Plan policies:

- Policy H1: Housing Requirement (Strategic Policy)
- Policy H2: Housing Allocations and Windfalls (Strategic Policy)
- Policy H3: Regeneration Opportunity Areas (Strategic Policy)
- Policy H4: Affordable Housing (Strategic Policy)
- Policy H5: Build to Rent

- Policy H6: Co-living Housing
- Policy H7: Custom and Self-build Housing
- Policy H8: Homes for Older People
- Policy H9: Supported Housing
- Policy H10: Purpose Built Student Accommodation
- Policy H11: Gypsy and Traveller Accommodation
- Policy H12: Residential Conversions and Houses in Multiple Occupation
- Policy H13: Loss of Residential Accommodation
- Policy H14: Accessible Homes
- Policy H15: Housing Density and Size Mix (Strategic Policy)
- Policy H16: Residential Amenity and Healthy Homes

6.98 The likely effects of the policies in relation to each SA objective are shown in Table 6.4 and described below the table. The likely effects of the reasonable alternative Policy approaches considered are also summarised below.

Table 6.4: Summary of SA findings for the Homes Policies

SA Objectives	Policy H1	Policy H2	Policy H3	Policy H4	Policy H5	Policy H6	Policy H7	Policy H8	Policy H9	Policy H10	Policy H11	Policy H12	Policy H13	Policy H14	Policy H15	Policy H16
SA1: Climate Change	0	0	0	0	0	+	0	+	+	+	+	0	0	0	0	0
SA2: Housing	++	++	+	++	++	++	++	++	++	+	++	+	+	++	+	++
SA3: Economic Growth	+	--/+?	+	0	0	0	0	0	0	0	0	0	0	0	+	0
SA4: Health	0	++/--?	+	+	+	+	0	+	++	+	+	+	0	++	+	++
SA5: Design and the Built Environment	0	0	+	+	++	++	+	+	+	+	+	+	0	0	0	+
SA6: Community	0	+	+	+	+	++	0	+	++	+	+	+	0	++	+	+
SA7: Services, Facilities and Education	0	+?/-?	0	0	0	+	0	+	++	++	++	0	0	0	0	0
SA8: Sustainable Travel	0	++	0	0	0	+	0	+	+	+	+	+	0	0	0	0
SA9: Pollution	0	--	0	0	0	+	0	+	+	+	+	0	0	0	0	+
SA10: Biodiversity and Geodiversity	-?	--?	0	0	0	0	0	0	0	0	+/0	0	0	0	0	0
SA11: Landscape	-?	-/0	0	0	0	0	+	0	0	0	+/0	+	0	0	+	0
SA12: Cultural Heritage	-?	-?	0	0	0	0	+	0	0	0	0	+	0	0	+	0
SA13: Water	-?	--	0	0	0	0	0	0	0	0	+	0	0	0	0	0
SA14: Resources	-?	++/--	++	+	0	0	0	0	0	0	0	0	0	0	+	0

Policy H1: Housing Requirement (Strategic Policy)

6.99 Policy H1: Housing Requirement (Strategic Policy) makes provision for 13,975 new homes over the Plan period, which equates to 642 homes per year between 2021 and 2041 plus a headroom to allow for choice and competition in the market. Overall, therefore, Policy H1 is expected to have a significant positive effect in relation to SA Objective 2: Housing. A minor positive effect is also expected in relation to SA Objective 3: Economic Growth, as the provision of an adequate housing supply will support the economic growth of the City by providing housing for the necessary workforce. However, the scale of housing development proposed through the Policy could have minor negative effects on the environmental SA objectives 10-14, although these effects are uncertain when considering only the overall quantum of housing and not its specific location.

6.100 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.101 The following alternatives to Policy H1: Housing Requirement (Strategic Policy) have been considered. They are:

- Reasonable Alternative 1: Base the housing requirement on a target that is higher than 642 homes per year – This is not considered appropriate. Paragraph 61 of the NPPF is clear that the housing requirement should be based on the standard method unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. There is currently no clear evidence to demonstrate that exceptional circumstances exist in Exeter. Delivering a higher figure could result in greater impacts within the city and may not be deliverable. Therefore, there is no clear evidence to suggest an alternative

to the annual target of 642 homes and this option has not been subject to SA as it is not considered to be reasonable, as previously described in Chapter 2.

- Reasonable Alternative 2: Base the housing requirement on a target that is lower than 642 homes per year - This is not considered appropriate. NPPF paragraph 61 is clear that the housing requirement should be based on the standard method unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. There is currently no clear evidence to demonstrate that exceptional circumstances exist in Exeter. Delivering a lower figure could result in reduced benefits to the housing market, particularly in terms of affordable housing provision. Therefore there is no clear evidence to suggest an alternative to the annual target of 642 homes. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable Alternative 3: Do not include any headroom in the Policy or include a different headroom - Not including any headroom in the Policy is not considered to be appropriate. Headroom enables choice and competition in the market and also allows for flexibility in the event that delivery is not as expected, meaning that the plan is more resilient to change.

Policy H2: Housing Allocations and Windfalls (Strategic Policy)

6.102 Policy H2: Housing Allocations and Windfalls (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 2: Housing because it allocates sites and supports the principle of windfall sites that together will significantly contribute to housing supply within the City. A significant positive effect is also expected in relation to SA Objective 8: Sustainable Travel because the majority of the sites allocated in this Policy are within close proximity of a railway station and a bus stop, and therefore the people who move to these sites may be encouraged to use public transport.

6.103 A significant negative effect is expected in relation to SA Objective 9: Pollution because more than half of the sites allocated in Policy H2 are located within close proximity of an AQMA. Therefore, development of these sites could result in an increase in pollution associated with an increase in car numbers in those area, exacerbating existing air pollution issues. Further to this, there are a small number of sites located within the flightpath of Exeter Airport and/or within close proximity of the M5, where residents are therefore likely to be exposed to high levels of noise pollution. It is important to note, however, that a number of the allocations listed in this Policy are not within close proximity of an AQMA, the Exeter Airport flightpath or the M5, and will therefore not result in adverse effects on pollution.

6.104 Policy H2 is also likely to have a negligible effect in relation to SA Objective 13: Water, as almost all the sites are not located within an area of flood risk and/or an area with a 1 in 30 year risk of surface water flooding.

6.105 The Policy is likely to have a minor negative effect in relation to SA Objective 10: Biodiversity and Geodiversity because half of the sites allocated under this Policy are located within close proximity of designated biodiversity or geodiversity sites, some of which are internationally designated. There are also some sites that contain an existing green infrastructure asset that could be lost as a result of development, although this is uncertain. Appropriate mitigation may also help avoid adverse effects and even result in beneficial effects. Overall, therefore, the effect is recorded as uncertain.

6.106 Five of the sites allocated in Policy H2 were found to have potential significant negative effects on the landscape. However, most of the sites allocated in the Policy are located outside of the areas of highest landscape sensitivity, and so overall a mixed effect (minor negative and negligible) is likely in relation to SA Objective 11: Landscape. However, this is uncertain as effects on the landscape will depend on factors such as the design and layout of sites, which cannot be known at this stage.

6.107 Each site allocation was assessed through a Heritage Impact Assessment and given a RAG rating dependant on the impact of the site on the

historic environment/heritage assets. A minor negative effect is expected in relation to SA Objective 12: Cultural Heritage because half of the sites have the potential to cause some form of harm to the significance of the historic environment/heritage assets. A smaller number of sites are considered to have potential to cause substantial harm to the significance of the historic environment/heritage assets. The effect is recorded as uncertain because the actual effect will depend on factors such the design of development and whether there are sight lines between the development and nearby heritage assets, which will be unknown until planning application stage.

6.108 A mixed significant positive and significant negative effect is expected in relation to SA Objective 4: Health because most of the allocated housing sites are within close proximity of a healthcare facility and area of open space/sports facility, and around a third of the allocated sites overlap an area of open space and/or accommodate an outdoor sports facility, which may be lost as a result of development. The negative effect is recorded as uncertain because the actual effect will depend on the exact scale, layout and design of development and whether the existing features are in fact lost to new development.

6.109 A mixed significant positive and significant negative effect is also expected in relation to SA Objective 14: Resources. This is because most of the allocated sites comprise entirely brownfield land and their redevelopment will therefore represent an efficient use of previously developed land. However, a similar number of sites are either greenfield land which are located on best and most versatile agricultural land, or are partly greenfield.

6.110 A significant negative effect is expected against SA Objective 3: Economic Growth to reflect the fact that three of the allocated mixed-use strategic sites could result in the loss of existing employment uses to other uses, some of which would be residential. However, the effect is recorded as uncertain because it is unknown how much of the existing employment uses will be retained and whether any additional employment uses will be provided, particularly through mixed use sites. In addition to this, a small part of one of the residential allocations is in employment use, although it has been vacant for some time. The significant negative but uncertain effect is mixed with a minor

positive effect because the mixed-use sites allocated by this Policy will positively contribute to economic growth within the City.

6.111 A potential but uncertain mixed minor positive and minor negative effect is identified in relation to SA Objective 7: Services, Facilities and Education because, despite providing a considerable number of new homes and being within close proximity to numerous services, facilities and educational establishments, some of the allocated sites have a lower site capacity and are further from the city centre and district/local centres.

6.112 A minor positive effect is likely in relation to SA Objective 6: Community because a small number of the sites being allocated are located within the 20% most deprived areas in Exeter. Therefore, each of these sites is likely to benefit from regeneration.

6.113 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.114 The likely effects of the reasonable alternative housing site options were presented in Chapter 5.

Policy H3: Regeneration Opportunity Areas (Strategic Policy)

6.115 Policy H3: Regeneration Opportunity Areas (Strategic Policy) is expected to have a minor positive effect on SA Objective 2: Housing because it supports development proposals on brownfield land, including for residential use. Similarly, the Policy is expected to have a minor positive effect in relation to SA Objective 3: Economic growth as it supports the development of mix of uses on brownfield sites, which may include employment, as well as ensuring development on brownfield land ensure no loss of employment floorspace.

6.116 The Policy is expected to have a significant positive effect in relation to SA Objective 14: Resources as its primary purpose is to promote the development of brownfield land, which will aid in supporting efficient use of resources in Exeter.

6.117 Minor positive effects are expected for SA Objective 5: Design and the Built Environment and SA Objective 6: Community as the Policy promotes development which will enhance the urban environment as well as achieve acceptable levels of amenity for new and existing residents. Regeneration areas can also have a positive impact on health and wellbeing by reducing the level of derelict land where residents live. Therefore, a minor positive effect is expected in relation to SA Objective 4: Health. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.118 The following alternatives to Policy H3: Regeneration Opportunity Areas (Strategic Policy) have been considered. They are:

- Reasonable Alternative 1: Do not include a policy – this is not considered appropriate, as the City Council wishes to specifically promote brownfield regeneration on suitable sites during the plan period.

6.119 Reasonable Alternative 1 would not provide specific policy support for the redevelopment of brownfield land that could deliver housing and support economic growth and help reduce the level of vacant and derelict land across Exeter City. Overall, minor positive effects are expected in relation to SA Objective 2: Housing, SA Objective 3: Economic Growth, SA Objective 5: Design and the built environment and SA Objective 6: Community. Having no policy would not explicitly support the regeneration of brownfield land and therefore help to minimise greenfield development. Therefore, a minor positive effect is expected in relation to SA Objective 14: Resources. Negligible effects are expected against the remaining SA objectives.

Policy H4: Affordable Housing (Strategic Policy)

6.120 Policy H4: Affordable Housing (Strategic Policy) is expected to have a significant positive effect on SA Objective 2: Housing as it seeks to address affordable housing provision in Exeter. The Policy requires affordable housing on developments of 10 dwellings or more with a site area of 0.5 hectares. At least 15% of homes are to be provided as affordable housing on brownfield land and at least 35% as affordable housing on greenfield land. The affordable housing tenure split on both brownfield and greenfield land is to be 50% social rent and 50% affordable home ownership. The Policy also ensures that the size mix of the affordable housing reflects local need.

6.121 A minor positive effect is expected against SA Objective 5: Design and the Built Environment as the Policy requires affordable housing to be fully integrated into the development, be of the same high quality design as, and be completed proportionally with, market homes. This will help ensure a higher standard of affordable homes than might otherwise be delivered.

6.122 A minor positive effect is also expected in relation to SA Objective 6: Community. The provision of affordable housing is supported by this policy, which is expected to deliver integrated neighbourhoods, particularly because the Policy requires affordable housing to be well-integrated with market housing within development sites in terms of both location and design. A minor positive effect is also expected in relation to SA Objective 4: Health as the delivery of affordable housing will help to minimise inequalities in relation to health by ensuring everyone has access to good quality housing.

6.123 The Policy states that development which is eligible for Vacant Building Credit must set out robust, supporting evidence of this. This could encourage the conversion of vacant buildings into affordable housing. Therefore, a minor positive effect is expected in relation to SA Objective 14: Resources.

6.124 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.125 The following alternatives to Policy H4: Affordable Housing (Strategic Policy) have been considered. They are:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need for those who require affordable housing. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable alternative 2: Require different percentages of affordable housing from major developments – this is not considered appropriate. The percentages are set in light of the level of need for affordable housing identified in the 2022 Exeter Local Housing Market assessment and the viability assessment of the Exeter Plan.
- Reasonable alternative 3: Require a different tenure split of affordable housing – this is not considered appropriate at this stage. The tenure split is set in light of the need for different types of affordable housing identified in the 2022 Exeter Local Housing Market assessment and the viability assessment of the Exeter Plan.

6.126 Reasonable alternative 2 seeks to require a different affordable housing percentage for major developments. Requiring a different percentage of affordable housing may not provide the level of affordable housing required or may affect the viability of major developments. Therefore, a mixed effect (minor positive and minor negative) is expected against SA Objective 2: Housing. Negligible effects are expected against the remaining SA objectives.

6.127 Reasonable alternative 3 seeks to require a different tenure split of affordable housing which may not result in Exeter City meeting the required need of housing and type of housing. Therefore, a mixed effect (minor positive and minor negative) is expected against SA Objective 2: Housing. Negligible effects are expected against the remaining SA objectives.

Policy H5: Build to Rent

6.128 Considering the narrow focus of Policy H5: Build to Rent, it is expected to have mainly negligible effects on the SA objectives. Policy H5 supports the development of build to rent proposals. Therefore, a significant positive effect is expected in relation to SA Objective 2: Housing. The build to rent houses are required to remain that way for 15 years. The Policy also requires 20% of homes on build to rent developments to be affordable private rent. The Policy ensures that the size mix of the affordable housing reflects local need.

6.129 A significant positive effect is also expected against SA Objective 5: Design and the Built Environment as the Policy requires the market build to rent homes to be of a high design quality and requires the affordable private rent housing to be fully integrated into a development and built to the same high quality design standards and sizes as the market homes. This will help to ensure a design high standard all of the build to rent homes.

6.130 A minor positive effect is expected in relation to SA Objective 6: Community. The policy requires affordable private rent housing to be well-integrated with market housing within development sites in terms of both location and design, therefore helping to deliver integrated neighbourhoods. A minor positive effect is also expected in relation to SA Objective 4: Health as the delivery of affordable build to rent housing will help to minimise inequalities in relation to health and wellbeing by ensuring everyone has access to good quality housing.

6.131 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.132 The following alternatives to Policy H4: Build to Rent have been considered. They are:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need for people who rent their homes. There is also a need for a development management Policy on Build to Rent, given growing market interest in Exeter. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable alternative 2: Require the affordable private rent housing from Build to rent developments to be let at discount that is lower than 20% - This is not considered appropriate. The 2024 Exeter Local Housing Needs Assessment indicates that a 20% discount is appropriate in Exeter. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.

Policy H6: Co-living Housing

6.133 Policy H6: Co-living Housing is expected to have a significant positive effect in relation to SA objective 2: Housing and SA Objective 5: Design and the built environment as the Policy supports co-living development that is of a high quality. The Policy also requires developments to deliver a financial contribution towards the off-site provision of affordable housing . Therefore, the Policy will address the housing needs of more specialist groups, including older people and blue badge holders and a significant positive effect is identified in relation to SA objective 6: Community.

6.134 A minor positive effect is also identified in relation to SA Objective 8: Sustainable Travel as the Policy supports the use of active travel and sustainable transport measures by requiring co-living developments to be located within a controlled parking zone and be well connected to employment and local services and facilities by walking, cycling and public transport; be accompanied by a travel plan and travel pack and include no private car parking other than for people with disabilities; and incorporate bike storage and vehicle drop-off and pick-up. A minor positive effect is identified in relation to SA

objective 7: Services, Facilities and Education as the Policy facilitates good access to communal spaces and facilities at a sufficient quantity to meet the needs of the total number of intended residents and located to provide each resident with convenient access to essential facilities.

6.135 Further minor positive effect is identified in relation to SA Objective 1: Climate Change, SA Objective 4: Health and SA Objective 9: Pollution as the Policy will increase the uptake of sustainable travel, which will reduce transport-related pollution, including carbon dioxide emissions. Improvements in air quality from a reduction in pollution will have a positive impact on residents' health. In addition, an increase in active travel will support healthier lifestyles for residents.

6.136 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.137 The following alternatives to Policy H5: Co-living Housing have been considered. They are:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need for people who rent their homes. There is also a need for a development management Policy on Co-Living housing, given growing market interest in Exeter. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable alternative 2: Require a different percentage of affordable housing from Co-Living developments – this is not considered appropriate. Planning Practice Guidance is clear that 20% is generally a suitable benchmark for the level of affordable housing to be provided in any build to rent scheme. Co-Living housing is a form of Build to Rent housing. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.

Policy H7: Custom and Self-build Housing

6.138 Policy H7: Custom and Self-build Housing is expected to have a significant positive effect in relation to SA Objective 2: Housing as the Policy supports the development of these types of housing. On sites of 20 or more homes, at least 5% of homes should be made available as serviced plots for sale to custom or self-builders.

6.139 Minor positive effects are identified in relation to SA Objective 5: Design and the Built Environment, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage as the Policy outlines that the plots must be integrated within the wider development.

6.140 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.141 The following alternatives to Policy H7: Custom and Self-build Housing have been considered. They are:

- Reasonable alternative 1: Do not include a custom and self-build housing Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need from people wishing to build or rent their own homes. The Council's self-build and custom housebuilding register demonstrates that there is demand for custom and self-build housing in the city.. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable alternative 2: Set a different site size threshold and percentage for custom and self-build provision on large sites - this is not considered appropriate. The threshold and percentage reflect what is considered to be viable in Exeter based on whole-plan viability testing. It is expected that additional custom and self-build homes to meet the demand

expressed by the Council's self-build and custom housebuilding register will come forwards in other ways, including on windfall sites and/or in order to help meet affordable housing requirements in major sites.

6.142 Reasonable alternative 2 proposes setting a different site size threshold and percentage for custom and self-build provision on large sites. Therefore, reasonable alternative 2 would still support the delivery of custom and self-build housing plots but may not meet the demand currently on the Council's self-build and custom building register. Therefore, a minor positive effect is expected against SA Objective 2: Housing. Negligible effects are expected against the remaining SA objectives.

Policy H8: Homes for Older People

6.143 Policy H8: Homes for Older People is expected to have a significant positive effect in relation to SA Objective 2: Housing as it promotes the development of good quality housing for older people as well as self-contained homes including some affordable housing. This will aid in bolstering the supply of high-quality housing of an appropriate mix of types, including for specialist groups. A minor positive effect is expected in relation to SA Objective 5: Design and the Built Environment as the Policy promotes the provision of good quality, well-designed homes.

6.144 Minor positive effects are expected for this Policy in relation to SA Objective 6: Community, SA Objective 7: Services, Facilities and Education and SA Objective 4: Health as it supports development that meets the needs of older people in the City by ensuring their homes are of good quality and well designed and well-connected to local services and community and support facilities, including health facilities.

6.145 Minor positive effects are also expected in relation to SA Objective 1: Climate Change, SA Objective 8: Sustainable travel and SA Objective 9: Pollution as the Policy ensures that development for older people is well-connected to local services and facilities, including public transport, which will

promote use of sustainable transport in Exeter. This will reduce private car use which will reduce emissions and thus improve air quality. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.146 The following alternatives to Policy H8: Homes for Older People have been considered. They are:

- Reasonable Alternative 1: Do not include a Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy. The local housing need assessment for the plan identifies need for older person's housing. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable Alternative 2: Include a Policy with a looser set of requirements – This is not considered appropriate given the specific requirements for housing for older people.

6.147 Reasonable Alternative 2 would still support the delivery of homes for older people to meet the identified need. Therefore, a minor positive effect is expected in relation to SA Objective 2: Housing. However, the Policy would likely not set out the same requirements in relation to ensuring high quality development and co-locating homes for older people in close proximity to services and facilities and public transport links. Therefore, minor negative effects would be expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. Negligible effects are expected against the remaining SA objectives.

Policy H9: Supported Housing

6.148 Policy H9: Supported Housing is expected to have a significant positive effect in relation to SA Objective 2: Housing as the Policy supports the development of supported housing which meets an identified need, providing an appropriate mix of types and tenures of properties to address the demand of specialist groups. In addition, the Policy requires that development proposals should be good quality, resulting in a minor positive effect in relation to SA Objective 5: Design and the Built Environment.

6.149 The Policy requires that development proposals should be well-connected to local services and community and support facilities, including health facilities and public transport; provide suitable levels of safe storage and charging facilities for residents' mobility scooters; provide accessible pick-up and drop-off facilities; make appropriate provision for refuse storage, management and collection; and do not result in unacceptable harm to the amenity of neighbouring residents. This will enable the needs of specific groups including those with protected characteristics, to be met including improved access to services and facilities. As a result, significant positive effects are identified in relation to SA Objective 6: Community and SA Objective 7: Services, facilities and education. Minor positive effects are identified in relation to SA Objective 1: Climate Change, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as the Policy will encourage sustainable travel, which will reduce transport-related pollution, including carbon dioxide emissions.

6.150 In addition, a significant positive effect is identified in relation to SA Objective 4: Health as the Policy supports sustainable transport, which will reduce related air pollution health impacts, while increasing levels of physical activity through active travel. Furthermore, the Policy requires that accommodation is to be designed to meet the support and care needs of the residents and enable them to retain their independence, which will improve residents' mental wellbeing.

6.151 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.152 The following alternatives to Policy H9: Supported Housing have been considered. They are:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need from older people and people with disabilities. The 2022 Exeter Local Housing Needs Assessment and evidence being developed by Devon County Council indicate that there is a need for specialist accommodation in the city. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.
- Reasonable alternative 2: Allocate sites for the provision of specialist accommodation – this is not considered appropriate as it may not allow for flexibility in delivering specialist housing.

6.153 Reasonable alternative 2 will allocate sites for the provision of specialist housing. As with Policy H7, reasonable alternative 2 will require the delivery of specialist housing to meet need. However, allocating specific sites for the provision of specialist housing may not allow for flexibility in delivering specialist housing. Therefore, a minor positive effect is expected in relation to SA Objective 2: Housing and SA Objective 4: Health. Negligible effects are expected against the remaining SA objectives.

Policy H10: Purpose Built Student Accommodation

6.154 Policy H10: Purpose Built Student Accommodation is expected to have a minor positive effect in relation to SA Objective 2: Housing as the Policy supports the development of purpose-built student accommodation to meet the needs of students in Exeter. The Policy also requires that development

proposals should provide residents with high quality housing, resulting in a minor positive effect in relation to SA Objective 5: Design and the Built Environment.

6.155 The Policy requires that purpose-built student accommodation should be located on the University of Exeter's campuses, in the city centre or on sites that are within controlled parking zones and that are well-connected to the campuses, local services and facilities by active travel and public transport and include sufficient communal facilities and services to meet student needs. Therefore, a significant positive effect is identified in relation to SA Objective 7: Services, facilities and education. These Policy requirements will help meet the needs of students and support community cohesion, particularly between students. Therefore, a minor positive effect is identified in relation to SA Objective 6: Community. The requirement to prepare a travel plan and travel pack and no private car parking other than for blue badge holders will encourage the use of sustainable travel. Therefore, minor positive effects are expected against SA Objective 1: Climate Change, SA Objective 4: Health SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as these Policy requirements will reduce transport-related pollution and related health impacts. In addition, an increase in active travel will support healthier lifestyles.

6.156 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.157 The following alternatives to Policy H10: Purpose Built Student Accommodation have been considered. They are:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need from students. Exeter is a University City with high demand for student accommodation and it is important to have a Policy that allows planning applications to be

assessed. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.

- Reasonable alternative 2: Constrain the development of purpose built student accommodation to areas where very little/no such accommodation currently exists – this is not considered appropriate. In the interests of delivering upon the Council's 2030 Net Zero ambitions, it is important that students are able to live within walking and cycling distance of the University of Exeter's campuses and local services and facilities.

6.158 Reasonable alternative 2 seeks to constrain the development of purpose built student accommodation to areas where very little/no such accommodation exists. In line with Policy H8, Reasonable alternative 2 would provide the development of purpose built student accommodation to meet the needs of students in Exeter. However, reasonable alternative 2 would result in student accommodation that is poorly located away from services and facilities potentially requiring the use of private car. This could increase vehicle emissions with less opportunities to take advantage of active travel and reduce accessibility to services and facilities. Overall, a minor positive effect is expected against SA Objective 2: Housing and minor negative effects against SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 6: Community, SA Objective 7: Services, facilities and Education, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. Negligible effects are expected against the remaining SA objectives.

Policy H11: Gypsy and Traveller Accommodation

6.159 Policy H11: Gypsy and Traveller Accommodation is expected to have a significant positive effect in relation to SA Objective 2: Housing as the Policy supports development proposals for Gypsy and Traveller pitches or plots for travelling show-people. In addition, the Policy requires the delivery of affordable Gypsy and Traveller accommodation.

6.160 A significant positive effect is identified for SA Objective 7: Services, Facilities and Education as the Policy requires accommodation to be located with convenient access to services, facilities, education and employment areas. The Policy also requires development proposals to include onsite facilities including space for parking, storage, children's play and residential amenity. These requirements will encourage sustainable travel and support healthy lifestyles, while reducing transport related emissions, including carbon dioxide emissions. Therefore, minor positive effects are expected against SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution.

6.161 The Policy requires development proposals to not cause unacceptable landscape or ecological impact as well as provide suitable environmental quality for the residents. In addition, proposals are required to be located within the urban boundary. As a result, mixed effects (minor positive and negligible) are expected in relation to SA Objective 10: Biodiversity and Geodiversity and SA Objective 11: Landscape.

6.162 The Policy also requires development proposals to provide suitable refuse storage, management and collection and not be in an area at high risk of flooding. These requirements will reduce the likelihood of water pollution as well as mitigate flood risk. Therefore, a minor positive effect is identified in relation to SA Objective 13: Water.

6.163 Minor positive effects are expected in relation to SA Objective 5: Design and the Built Environment and SA Objective 6: Community as the Policy requires development proposals to provide suitable children's play facilities and residential amenity, safe and convenient vehicular, pedestrian and cycle access to local facilities, suitable environmental quality for the residents, and ensure no unacceptable harm to the amenity of neighbouring residents. This will ensure suitable design of developments and deliver cohesive neighbourhoods with high levels of pedestrian activity/outdoor interaction.

6.164 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternative

6.165 The following alternative to Policy H11: Gypsy and Traveller Accommodation has been considered:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy, including the need from travellers. The 2024 Exeter Gypsy and Traveller Accommodation Assessment does not indicate a need to allocate new sites to provide Gypsy and Traveller accommodation but does indicate that there may be a need for additional Gypsy and Traveller accommodation in the future. It is important that there is a development management Policy in place to be able to assess planning applications. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.

Policy H12: Residential Conversions and Houses in Multiple Occupation

6.166 Houses in multiple occupation can be more affordable and contribute to providing a range of housing options to meet the needs of a mix of people. They can also help to make best use of existing building stock as converting HMOs will provide accommodation for more people. The Policy requires the HMO to be of sufficient internal and external space to meet the resident's needs. Therefore, Policy H10 is expected to result in a minor positive effect on SA Objective 2: Housing. The affordability of HMOs may also indirectly help to reduce inequality, giving a minor positive effect for SA Objective 4: Health. In addition, the Policy will ensure that the conversion or change of use of buildings to HMOs will not have a negative impact on the amenity of neighbouring residents. Therefore, minor positive effect is expected for SA Objective 6: Community.

6.167 A minor positive effect is expected against SA Objective 5: Design and the Built Environment as the Policy requires HMOs to be of high quality and provide sufficient external amenity space. The Policy also ensures that the conversion of a building to HMO will not have an unacceptable impact on transport resulting in a minor positive effect against SA Objective 8: Sustainable transport.

6.168 A Minor positive effect is expected against SA Objective 11: Landscape and SA Objective 12: Cultural heritage as the Policy requires development proposals to respect the character and appearance of the building and the surrounding area. Development in the Article 4 area will not be permitted other than in exceptional circumstances. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.169 No reasonable alternatives have been considered to Policy H12: Residential Conversions and Houses in Multiple Occupation.

Policy H13: Loss of residential accommodation

6.170 Considering its narrow focus, Policy H13 is expected to have mainly negligible effects on the SA objectives. Policy H13 will ensure there is no net loss of residential units. However, the Policy will not increase the number of residential units and therefore not result in additional housing. Therefore, a minor positive effect is expected in relation to SA Objective 2: Housing. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.171 One alternative to Policy H13: Loss of Residential Accommodation has been considered. It is:

- Reasonable alternative 1: Amended Policy which specifies the circumstances under which a net loss of residential units will be permitted – this is not considered appropriate as it will be too prescriptive. The supporting text to the Policy instead gives examples of where a net loss may be considered acceptable.

6.172 Reasonable alternative 1 still proposes to safeguard the loss of residential accommodation but will allow the conversion of residential accommodation in certain cases. Therefore, reasonable alternative 1 is expected to have the minor negative effect against SA Objective 2: Housing. Negligible effects are expected against the remaining SA objectives.

Policy H14: Accessible Homes

6.173 Considering its narrow focus Policy H14 is expected to have mainly negligible effects on the SA objectives. The Policy is expected to have a significant positive effect in relation to SA Objective 2: Housing given that it specifically seeks to address the issue of accessible housing provision in Exeter, such as homes for people with disabilities. The requirement for accessible homes covers both market and affordable housing. A significant positive effect is expected against SA Objective 4: Health and SA Objective 6: Community as the Policy requires housing that is accessible to wheelchair users. This will help narrow health inequalities when it comes to housing and meet the needs of people with disabilities. The Policy requires a threshold of affordable homes to be for wheelchair users which will help people that are from lower incomes.

Reasonable Alternatives

6.174 The following alternatives to Policy H14: Accessible Homes have been considered. They are:

- Reasonable alternative 1: No Policy – this is not considered appropriate. Paragraph 63 of the NPPF is clear that the size, type and tenure of

housing needed for different groups in the community should be assessed and reflected in planning policy. This option has not been subject to SA as it is not considered to be reasonable as it does not accord with national policy.

- Reasonable alternative 2: Require a different proportion of accessible housing – this is not considered appropriate. The percentages in the Policy are informed by the level of need for accessible housing identified in the 2024 Exeter Local Housing Market assessment and the viability appraisal of the Exeter Plan. The supporting text sets out that exceptions to these percentages may be acceptable.

6.175 Reasonable alternative 2 seeks to require different proportions of accessible housing which may not result in Exeter City meeting the required need for accessible housing. This could widen health inequalities within Exeter City due to a lack of homes to meet the needs of people with disabilities. Therefore, significant negative effects are expected against SA Objective 2: Housing, SA Objective 4: Health and SA Objective 6: Community. Negligible effects are expected against the remaining SA objectives.

Policy H15: Housing Density and size Mix (Strategic Policy)

6.176 Policy H15: Housing Density and Size Mix (Strategic Policy) requires development proposals for housing to optimise density and incorporate a mix of housing sizes. Therefore, a minor positive effect is expected in relation to SA Objective 2: Housing. A minor positive effect is expected in relation to SA Objective 4: Health as the policy will ensure that development proposals meet the needs of all, potentially reducing levels of inequality. In addition, the Policy requires development proposals to meet the local need and include a mix of house size that fits in with the local area. This will help a new development integrate well into the existing local area resulting in a minor positive effect against SA Objective 6: Community.

6.177 The Policy requires that housing development make efficient use of land while optimising housing density taking into account local context. Therefore, minor positive effects are expected in relation to SA Objective 11: Landscape, SA Objective 12: Cultural Heritage and SA Objective 14: Resources.

6.178 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.179 No reasonable alternatives have been considered to Policy H15: Housing Density and Size Mix (Strategic Policy).

Policy H16: Residential Amenity and Healthy Homes

6.180 A significant positive effect is expected against SA Objective 2: Housing as Policy H16 supports high quality residential development that will not have unacceptable impacts on neighbouring developments. The Policy includes reference to creating healthy living conditions and creating a good standard of amenity for future residents. This will result in a significant positive effect against SA Objective 4: Health as this Policy supports creating healthy environments for future residents that is free from unnecessary pollution and/or disturbance.

6.181 Policy H16 requires certain space standards to be met with sufficient internal and external space and appropriate storage in line with nationally described space standards. The Policy also requires future proofing for changes in lifestyle. Therefore, a minor positive effect is expected in relation to SA Objective 5: Design and the Built Environment as the Policy requires an appropriate level of design. A minor positive effect is expected in relation to SA Objective 6: Community as the Policy will ensure that residential development

does not have an unacceptable impact on the amenity of neighbouring residents.

6.182 A minor positive effect is expected in relation to SA Objective 9: Pollution as the Policy requires light and air pollution and noise disturbance to be taken into account within development proposals. This will ensure there is no unacceptable harm to neighbouring residents.

6.183 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.184 No reasonable alternatives have been considered to Policy H16: Residential Amenity and Healthy Homes.

Economy and Jobs

6.185 This section presents the appraisals of the following Exeter Plan policies:

- Policy EJ1: Economic Growth (Strategic Policy)
- Policy EJ2: Retention of Employment Land (Strategic Policy)
- Policy EJ3: New forms of Employment Provision (Strategic Policy)
- Policy EJ4: Access to Jobs and Skills
- Policy EJ5: Provision of Local Services in Employment Areas
- Policy EJ6: New Transformational Employment Allocations (Strategic Policy)

6.186 The likely effects of the policies in relation to each SA objective are shown in Table 6.5 and described below the table. The likely effects of the reasonable alternative options considered are also summarised below.

Table 6.5: Summary of SA findings for the Economy and Jobs Policies

SA Objectives	Policy EJ1	Policy EJ2	Policy EJ3	Policy EJ4	Policy EJ5	Policy EJ6
SA1: Climate Change	0	0	0	0	0	0
SA2: Housing	0	0	0	0	0	0
SA3: Economic Growth	++	++	++	++	+	++
SA4: Health	0	0	0	+	+?	++
SA5: Design and the Built Environment	0	0	0	0	0	0
SA6: Community	0	0	0	0	0	0
SA7: Services, Facilities and Education	+	0	0	+	+	+/-
SA8: Sustainable Travel	0	0	+	0	+	++
SA9: Pollution	0	+	+	0	0	0
SA10: Biodiversity and Geodiversity	0	0	0	0	0	0
SA11: Landscape	0	0	0	0	0	0
SA12: Cultural Heritage	0	0	0	0	0	0/--
SA13: Water	0	0	0	0	0	0
SA14: Resources	0	++	0	0	0	++/--

Policy EJ1: Economic Growth (Strategic Policy)

6.187 Policy EJ1: Economic Growth (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 3: Economic Growth because it supports development proposals where they meet the economic

needs of the city as identified in the Economic Development Needs Assessment (EDNA). According to the policy, Exeter is committed to becoming one of the UK's leading knowledge and clean growth economies.

6.188 The Policy is also expected to have a minor positive effect in relation to SA Objective 7: Services, Facilities and Education because the Policy seeks improved education and training work with partner authorities and other stakeholders to deliver improvements to digital and other infrastructure, in order to encourage and support growth in the transformational sectors.

6.189 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.190 One reasonable alternative to Policy EJ1: Economic Growth (Strategic Policy) in the transformational sectors has been considered:

- Reasonable Alternative 1: Policy to allocate sites – It was decided that sites should be allocated for the transformational sectors, with a gateway approach being used to control uses (see Policy EJ6 below). This option has not been subject to SA as it is addressed by the appraisal of Policy EJ6.

Policy EJ2: Retention of Employment Land (Strategic Policy)

6.191 Policy EJ2: Retention of Employment Land (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 14: Resources because, while the Policy supports the retention of employment areas, it also supports the re-use and redevelopment of employment land where the site is allocated for mixed use redevelopment, or where regeneration would make more efficient use of the land and would not result in any loss of employment floorspace. It must also be demonstrated that employment use is no longer

viable and there is no reasonable prospect of the site being used for employment purposes in the future. This represents an efficient use of previously developed land.

6.192 A significant positive effect is expected in relation to SA Objective 3: Economic Growth because the Policy supports the retention of existing employment areas, which will ensure the economy can continue to grow. The protection of established employment areas will also allow opportunities for businesses in these areas to grow, expand and redevelop. A minor positive effect is also expected against SA Objective 9: Pollution because the Policy supports the loss of employment land to an alternative use where the current employment uses have an unacceptable amenity impact on local residents.

6.193 Negligible effects are expected against the remaining objectives.

Reasonable Alternatives

6.194 Two reasonable alternatives have been considered to Policy EJ2: Retention of Employment Land (Strategic Policy):

- Reasonable Alternative 1: Less restrictive Policy that does not seek to retain areas in employment use – This could lead to the incremental loss of established employment areas to other uses which would not allow businesses to expand and adapt in accordance with the NPPF.
- Reasonable Alternative 2: More restrictive Policy retaining more sites for employment space – It would not be reasonable to retain sites that are not viable or where there are unacceptable amenity impacts for local residents.

6.195 Reasonable Alternative 1 would not require any existing employment areas to be retained. Therefore, a minor negative effect is expected in relation to SA Objective 3: Economic Growth. Negligible effects are expected against the remaining SA objectives.

6.196 Reasonable Alternative 2 would retain more sites than those listed in Policy EJ2: Retention of employment land. However, this could potentially result in some sites being retained that are not viable or no longer needed. Therefore, a mixed minor positive and minor negative but uncertain effect is expected in relation to SA Objective 3: Economic Growth. There could also be a minor negative effect on SA Objective 2: Housing, if this approach were to prevent the re-use of employment sites for housing where this may in fact be appropriate. Negligible effects are expected against the remaining SA objectives.

Policy EJ3: New forms of Employment Provision (Strategic Policy)

6.197 Policy EJ3: New forms of Employment Provision (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 3: Economic Growth because it promotes economic growth by supporting flexible working. In promoting flexible working, the Policy supports the provision of work hubs, collaborative workspaces and live-work schemes.

6.198 The Policy is likely to have minor positive effects in relation to both SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because it seeks to reduce the need to travel through supporting flexible working. Reducing the need to travel reduces reliance on the private car and associated noise and air pollution.

6.199 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.200 Two reasonable alternatives have been considered to Policy EJ3: New forms of Employment Provision (Strategic Policy):

- Reasonable Alternative 1: No requirement for larger scale development to address the demand for new ways of working – This option would not

maximise the significant potential of large scale development to address the need for flexible working.

- Reasonable Alternative 2: Require all development to provide new forms of employment provision – This does not seem appropriate, particularly for small-scale developments, and could impact on viability.

6.201 Reasonable Alternative 1 would not support new forms of employment provision within large-scale developments. However, it would still support work hubs, collaborative workspaces and live-work units elsewhere. Therefore, Reasonable Alternative 1 is expected to have a minor positive effect in relation to SA Objective 3: Economic Growth, although to a lesser extent than Policy EJ3.

6.202 Reasonable Alternative 1 is also expected to have minor positive effects in relation to SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because supporting flexible working would reduce the need for people to travel, and help reduce pollution associated with use of the private car albeit to a lesser extent than Policy EJ3. Negligible effects are expected against the remaining SA objectives.

Policy EJ4: Access to Jobs and Skills

6.203 Policy EJ4: Access to Jobs and Skills is expected to have a significant positive effect against SA Objective 3: Economic Growth because it seeks to enable access and remove barriers to employment opportunities for all, including supporting employment initiatives such as work placements. This will be achieved by requiring all major development proposals to submit and deliver the provisions in an Employment and Skills Plan.

6.204 A minor positive effect is expected in relation to SA Objective 4: Health as supporting access to employment and learning opportunities will improve access to skills and development job opportunities for all. Opportunities to upskill and access employment can have a positive impact on health and wellbeing, particularly mental health. The Policy is expected to have a minor

positive effect SA Objective 7: Services, Facilities and Education because it supports access to learning opportunities by supporting employment initiatives and facilitating skills development and learning opportunities. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.205 Two reasonable alternatives have been considered to Policy EJ4: Access to Jobs and Skills:

- Reasonable Alternative 1: No requirement for an Employment and Skills Plan – Without this requirement it would be difficult to ensure delivery.
- Reasonable Alternative 2: All development to submit an Employment and Skills Plan – This does not seem appropriate, particularly for small scale development, and could impact on viability.

6.206 Reasonable Alternative 1 is likely to have the same effects as Policy EJ4. However, because there is no requirement for an Employment and Skills Plan to be submitted, the effects are more uncertain. Therefore, Reasonable Alternative 1 is likely to have a significant positive but uncertain effect in relation to SA Objective 3: Economic Growth and a minor positive but uncertain effect in relation to SA Objective 7: Services, Facilities and Education. Negligible effects are expected against the remaining SA objectives.

6.207 Reasonable Alternative 2 requires all development proposals, regardless of scale, to submit an Employment and Skills Plan. This is excessive and would not necessarily change the significance of the effects recorded against Policy EJ4. Overall, therefore, a significant positive effect is expected against SA Objective 3: Economic Growth and a minor positive effect is expected against SA Objective 7: Services, Facilities and Education. Negligible effects are expected against the remaining SA objectives.

Policy EJ5: Provision of Local Services in Employment Areas

6.208 Policy EJ5: Provision of Local Services in Employment Areas supports development proposals for the provision of local services where certain criteria are met. Given that the Policy will result in the provision of local services, a minor positive effect is expected in relation to SA Objective 7: Services, Facilities and Education. However, the service should be of a type and size to serve local workforce needs only.

6.209 A minor positive effect is expected against SA Objective 3: Economic Growth as the Policy will ensure that no harm will come to the primary function of the business park or industrial estate as a result of the development of local services. This will help ensure no negative impact on employment generating areas. The Policy will result in the provision of services to the local workforce but it is unknown the type of services that will be provided. Therefore, a potential but uncertain minor positive effect is identified for SA Objective 4: Health.

6.210 A minor positive effect is expected against SA Objective 8: Sustainable transport as the Policy requires the local services to be located within reasonable walking distance of the local workforce. This will result in the local workforce less reliant on the private car to travel to these services. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.211 Two reasonable alternatives have been considered to Policy EJ5: Provision of Local Services in Employment Areas:

- Reasonable Alternative 1: Less restrictive Policy – This would risk the established employment areas becoming dominated with uses that do not provide significant jobs and investment.

- Reasonable Alternative 2: More restrictive Policy – This could fail to meet the needs of the local workforce and increase the need to travel.

6.212 Reasonable Alternative 1 would result in the provision of local services; however a less restrictive Policy would likely mean that service provision is not limited to service the local workforce only, therefore a significant positive effect is expected in relation to SA Objective 7: Services, Facilities and Education. However, a minor negative effect is expected in relation to SA Objective 3: Economic Growth as a less restrictive Policy could result in established employment areas becoming dominated by uses that do not provide significant jobs and investment which would not result in economic growth. A negligible effect is expected in relation to SA Objective 8: Sustainable transport as a less restrictive Policy would likely not require development to be located within reasonable walking distance of the local workforce. Negligible effects are expected against the remaining SA objectives.

6.213 Reasonable Alternative 2 would support a more restrictive policy. A more restrictive Policy would restrict the development of services, therefore not meeting the needs of the local workforce resulting in a significant negative effect is expected in relation to SA Objective 7: Services, Facilities and Education. A minor positive effect is expected in relation to SA Objective 3: Economic Growth as the Reasonable Alternative will still safeguard land for employment development. In addition, a reduced provision of services and facilities may result in people needing to travel further to access services. This would result in the local workforce being more reliant on the private car to travel, Therefore, a minor negative effect is expected in relation to SA Objective 8: Sustainable transport. Negligible effects are expected against the remaining SA objectives.

Policy EJ6: New Transformational Employment allocations (Strategic Policy)

6.214 Policy EJ6: New Transformational Employment Allocations (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 3: Economic Growth because it supports development proposals for

the transformational sectors, such as data analysis, environmental futures, health innovation, digital innovation and other emerging transformational sectors. The Policy allocates three employment site allocations for transformational employment development.

6.215 All three employment allocations are located within 720m of an area of open space and at least a footpath/cycle path. Therefore, significant positive effect is expected in relation to SA Objective 4: Health as the allocation of these sites could encourage the use of active travel to commute and offer access to spaces for physical activity. In addition, the employment allocations are located within close proximity to public transport links resulting in significant positive effect in relation to SA Objective 8: Sustainable Travel. The close proximity of the employment allocations to public transport links could minimise the use of the private car and associated emissions. However, some increase in emissions is expected as a result of development. Overall, a negligible effect is expected in relation to SA Objective 9: Pollution.

6.216 Mixed effects (minor positive and minor negative) are expected in relation to SA Objective 7: Services, Facilities and Education as the majority of employment allocations are located outside of the City, local and district centres, impacting access to services and facilities. The location of these sites could encourage the use of the private car as they are located further from the City, local and district centres. However, access to public transport links is available.

6.217 A mixed effect (negligible and significant negative) is expected in relation to SA Objective 12: Cultural Heritage. Only the site allocation at St Luke's Campus is expected to result in substantial impact on the significance of a heritage asset as a result of development.

6.218 None of the employment allocations are located within close proximity to an international, national or local biodiversity designation, fall within a sensitive landscape area or an area of flood risk or at risk of surface water flooding.

6.219 Only the site allocation at St Luke's Campus comprises brownfield land and therefore represents the most efficient use of land. The development of the other two employment allocations will result in the loss of greenfield land which includes Grade 1 and/or 2 agricultural land. Therefore, mixed effects (significant positive and significant negative) are expected in relation to SA Objective 14: Resources.

6.220 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.221 One reasonable alternative has been considered to Policy EJ6: New Transformational Employment Allocations (Strategic Policy):

- Reasonable Alternative 1: Less restrictive Policy that doesn't limit the sites to the transformational sectors – This may not maximise the contribution these sites can make to innovation and investment.

6.222 Reasonable Alternative 1 would not limit the allocated sites to transformational sectors. Reasonable alternative 1 would still make a contribution to support the economy and jobs but would not maximise the contribution the allocated sites would make to innovation and investment. A minor positive effect is therefore expected in relation to SA objective 3: Economic growth. Negligible effects are expected against the remaining SA objectives.

Retail and the future of our Centres

6.223 This section presents the appraisals of the following Exeter Plan policies:

- Policy RFC1: The Future of our Centres (Strategic Policy)
- Policy RFC2: Development in, and affecting, our Centres (Strategic Policy)

6.224 The likely effects of the policies in relation to each SA objective are shown in Table 6.6 and are described below the table.

Table 6.6: Summary of SA findings for the Retail and the Future of our Centres Policies

SA Objectives	Policy RFC1	Policy RFC2
SA1: Climate Change	+	+
SA2: Housing	0	0
SA3: Economic Growth	++	+
SA4: Health	+	+
SA5: Design and the Built Environment	+	+
SA6: Community	+	+
SA7: Services, Facilities and Education	++	++
SA8: Sustainable Travel	+	+
SA9: Pollution	+	+
SA10: Biodiversity and Geodiversity	+	+
SA11: Landscape	+	+
SA12: Cultural Heritage	+	+
SA13: Water	0	0
SA14: Resources	+	+

Policy RFC1: The Future of our Centres

6.225 Policy RFC1: The Future of our Centres is expected to have significant positive effects in relation to SA Objective 3: Economic Growth and SA Objective 7: Services, Facilities and Education as it will enhance the vitality, viability and resilience of the city, district and local centres to increase prosperity, which includes diversifying the offer of the city centre, enhancing the night-time and visitor economy and improving its cultural offer.

6.226 Minor positive effects are expected for this Policy in relation to SA Objective 5: Design and the Built Environment, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage as the Policy also promotes attractive and vibrant public spaces, provision for nature and enhancements of heritage assets.

6.227 Increased development in city, district and local centres will likely facilitate the use of more sustainable forms of transport which includes public transport and active travel. The Policy also promotes high-quality facilities for active travel and public transport in centres to increase footfall. This could lead to opportunities to increase physical activity and promote healthy lifestyles while minimising private vehicle use and reducing the associated emissions. Therefore, minor positive effects are expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. The Policy will also help to deliver cohesive neighbourhoods with high levels of pedestrian activity/outdoor interaction, which will allow for informal interaction between residents. Therefore, a minor positive effect is expected in relation to SA Objective 6: Community.

6.228 Enhancements to city, district and local centres will likely result in the development and regeneration of brownfield land, resulting in minor positive effects in relation to SA Objective 14: Resources.

6.229 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.230 One reasonable alternative to Policy RFC1: The Future of our Centres has been considered. This is:

- Reasonable Alternative 1: Do not include a Policy – this is not considered appropriate given the importance of the vitality of the city centre to the spatial strategy. This option has not been subject to SA as it is not considered to be reasonable.

Policy RFC2: Development in, and affecting, our Centres (Strategic Policy)

6.231 Policy RFC2: Development in, and affecting, our Centres (Strategic Policy) is expected to have significant positive effects in relation to SA Objective 7: Services, Facilities and Education as it supports development proposals for retail uses, enhancing the viability, vitality and resilience of centres and ensuring that development outside the city, district and local centres will not have a significant adverse impact on investment in, and the vitality and viability of these centres. Proposals for retail use will likely generate some level of employment resulting in minor positive effect in relation to SA Objective 3: Economic Growth.

6.232 Minor positive effects are expected for this Policy in relation to SA Objective 5: Design and the Built Environment, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage as the Policy requires development proposals to make provision for high quality and resilient public realm, as well as conserve and enhance the cultural, historic and natural environment of city, district and local centres.

6.233 Increased development in city, district and local centres will likely encourage use of sustainable transport. The Policy also requires development proposals to minimise the need to travel and provide access in accordance with

the transport hierarchy and make provision for active travel and public transport. This will increase use of more sustainable forms of transport, resulting in more active and healthy lifestyles, as well as reducing private vehicle use and the associated emissions. Therefore, minor positive effects are expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. This will also help to deliver cohesive neighbourhoods with high levels of pedestrian activity/outdoor interaction, which will allow for informal interaction between residents. Therefore, a minor positive effect is expected in relation to SA Objective 6: Community.

6.234 Enhancements to city, district and local centres will likely result in the development and regeneration of brownfield land, resulting in minor positive effects in relation to SA Objective 14: Resources.

6.235 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.236 Three reasonable alternatives to Policy RFC2: Development in, and affecting, our Centres (Strategic Policy) have been considered. They are:

- Reasonable Alternative 1: Do not include a Policy – this is not considered appropriate given the importance of the vitality of the city centre to the spatial strategy. This option has not been subject to SA as it is not considered to be reasonable.
- Reasonable Alternative 2: Include a more restrictive Policy which limits potentially acceptable uses in the city, district and local centres to retail. This is not considered appropriate given the need to extend uses to retain the vitality of the centres.
- Reasonable Alternative 3: Include a less restrictive Policy regarding out of centre retail. This is not considered appropriate given the importance of needing to retain the primacy of the centres as the key retail and service location. This could also be in conflict with the NPPF. This option has not

been subject to SA as it is not considered to be reasonable as it does not accord with national policy.

6.237 A more restrictive Policy through Reasonable Alternative 2 could impact on the delivery of complementary uses and mixed use within the city, district and local centres. This could have a negative impact on the vitality and viability of these centres. However, the Policy will still support the delivery of retail and support employment within Exeter's centres. Therefore, minor positive effects are still expected in relation to SA Objective 3: Economic Growth and SA Objective 7: Services, Facilities and Education. Positive effects are also expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as the Policy will support some level of retail development within Exeter's centres, creating liveable places and where access to public transport links is available. A more restrictive Policy is still expected to have a positive impact on the townscape of Exeter's centres resulting in a minor positive effect in relation to SA Objective 11: Landscape and SA Objective 12: Cultural Heritage. Negligible effects are expected against the remaining SA objectives.

Sustainable Transport and Communications

6.238 This section presents the appraisals of the following Exeter Plan policies:

- Policy STC1: Sustainable Movement (Strategic Policy)
- Policy STC2: The Transport Hierarchy (Strategic Policy)
- Policy STC3: Supporting Active Travel (Strategic Policy)
- Policy STC4: Supporting Public Transport (Strategic Policy)
- Policy STC5: Supporting more Sustainable Forms of Car Use
- Policy STC6: Travel Plans
- Policy STC7: Safeguarding Transport Infrastructure (Strategic Policy)

- Policy STC8: Motorway Service Area (Strategic Policy)
- Policy STC9: Digital Communications (Strategic Policy)

6.239 The likely effects of the policies in relation to each SA objective are shown in Table 6.7 and described below the table.

Table 6.7: Summary of SA findings for the Sustainable Transport and Communications Policies

SA Objectives	Policy STC1	Policy STC2	Policy STC3	Policy STC4	Policy STC5	Policy STC6	Policy STC7	Policy STC8	Policy STC9
SA1: Climate Change	++	++	++	++	++	++	++	-	++
SA2: Housing	0	0	0	0	0	0	0	0	0
SA3: Economic Growth	+	+	+	0	0	0	0	++	0
SA4: Health	+	+	+	+	++	++	++	+/-	0
SA5: Design and the Built Environment	0	0	+	+	+	0	0	0	0
SA6: Community	+	+	+	0	+	0	+	0	0
SA7: Services, Facilities and Education	+	0	+	0	+	+	+	-	0
SA8: Sustainable Travel	++	++	++	++	++	++	++	+/-	+
SA9: Pollution	+	+	+	+	++	++	++	+/-	+
SA10: Biodiversity and Geodiversity	0	+	+	0	0	0	-	0	0
SA11: Landscape	0	+	0	0	0	0	0	0	0
SA12: Cultural Heritage	0	+	0	0	0	0	0	0	0
SA13: Water	0	0	0	0	0	0	0	0	0
SA14: Resources	0	0	0	0	0	0	0	0	0

Policy STC1: Sustainable Movement (Strategic Policy)

6.240 Policy STC1: Sustainable Movement (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 8: Sustainable Travel because it seeks to reduce the need to travel and support the transport hierarchy by maximising walking, cycling, wheeling and the use of public transport for the majority of everyday journeys. In addition, the Policy aims to maintain the transport function of the Exeter ship canal. The Policy also proposes to increase provision of electric vehicles and shared mobility. This will be achieved through the delivery of mixed-use development, which will ensure that communities can access most amenities on foot, or alternative inclusive mode, from their home. The transition to more sustainable forms of transport and reducing the need to travel will reduce private vehicle use. This will reduce transport-related pollution including carbon dioxide emissions which will help to mitigate the effects of climate change. This transition to more sustainable forms of transport will help Exeter City to transition by net zero by 2030. Therefore, a significant positive effect is identified in relation to SA Objective 1: Climate Change.

6.241 Easy access to services and facilities is expected to result in a minor positive effect in relation to SA Objective 7: Services, Facilities and Education. Encouraging walking, cycling, wheeling and use of public transport will reduce reliance on the private car and associated pollution. Therefore, a minor positive effect is expected in relation to SA Objective 9: Pollution. Minor positive effects are also expected in relation to SA Objective 4: Health and SA Objective 6: Community because encouraging more active transport modes is likely to have beneficial effects on people's health and wellbeing, in addition to increasing pedestrian activity and outdoor interactions between people.

6.242 The delivery of a low-carbon city where more active and sustainable transport modes are encouraged, is also expected to result in a minor positive

effect against SA Objective 3: Economic Growth because it supports Exeter as a strategic rail, road and air hub, with beneficial effects on the economy.

6.243 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.244 One reasonable alternative has been considered to Policy STC1: Sustainable Movement (Strategic Policy):

- Reasonable Alternative 1: A less restrictive Policy with less support for sustainable transport – This option could be less prescriptive in setting out requirements for active and public transport. This is unlikely to be appropriate as it could potentially result in a greater focus on car transport which would not be appropriate in terms of the net zero, health and place-making agendas.

6.245 Reasonable Alternative 1 would still support active and public transport, but to a lesser extent than Policy STC1. This could potentially result in more support for use of the private car than walking, cycling and public transport. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA Objective 8: Sustainable Travel. The continued use of the private car is also likely to continue to have adverse effects on air quality, and therefore a mixed minor positive and minor negative effect is expected in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution. Mixed minor positive and minor negative effects are also expected in relation to SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education. The minor positive effects are expected for the reasons outlined in the appraisal of Policy STC1, as this reasonable alternative option would still support active and sustainable transport modes but to a lesser extent. Negative effects are expected because this option could encourage use of the private car.

Policy STC2: The Transport Hierarchy (Strategic Policy)

6.246 Policy STC2: The Transport Hierarchy (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 8: Sustainable Travel. The Policy requires development to make provision for active travel and public transport first with road improvements to be considered last. Contributions towards additional or improved transport provision will be sought as well. Highway enhancements are supported, but only where they are necessary, and highway design will be expected to prioritise active and public transport. This may help reduce congestion and associated air and noise pollution. Therefore, overall, a minor positive effect is expected in relation to SA Objective 9: Pollution. A significant positive effect is expected in relation to SA Objective 1: Climate Change as the policy supports a transport hierarchy that prioritises active travel, public transport and more sustainable forms of car use. This will have a positive impact in reducing transport related emissions and helping to mitigate climate change. Prioritising more sustainable forms of transport will support Exeter City's transition to net zero by 2030.

6.247 Requiring provision for active transport modes will increase pedestrian activity and encourage informal interaction between residents, whilst also having beneficial effects on people's health and wellbeing. Therefore, minor positive effects are also expected in relation to SA Objective 4: Health and SA Objective 6: Community. A minor positive effect is also expected in relation to SA Objective 3: Economic Growth because supporting the delivery of active and sustainable travel in new developments will help achieve a low carbon economy.

6.248 Minor positive effects are expected in relation to SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage as highway enhancements will only be supported where they do not cause unacceptable harm to the local natural, built or historic environment.

6.249 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.250 One reasonable alternative has been considered to Policy STC2: The Transport Hierarchy (Strategic Policy):

- Reasonable Alternative 1: A less restrictive Policy with less support for sustainable transport – This option could be less prescriptive in setting out requirements for active and public transport in new development. This is unlikely to be appropriate as it could potentially result in a greater focus on car transport which would not be appropriate in terms of the net zero, health and place-making agendas.

6.251 Reasonable Alternative 1 would still support active and public transport, but to lesser extent than Policy STC2. This could potentially result in more support for use of the private car than walking, cycling and public transport. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA Objective 8: Sustainable Travel. The continued use of the private car is also likely to continue to have adverse effects on air quality, and therefore mixed minor positive and minor negative effect are expected in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution. Mixed minor positive and minor negative effects are also expected in relation to SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education. The minor positive effects are expected for the reasons outlined in the appraisal of Policy STC2, as this reasonable alternative option would still support active and sustainable transport modes but to a lesser extent. Negative effects are expected because this option could encourage use of the private car. Negligible effects are expected against the remaining SA objectives.

Policy STC3: Supporting Active Travel (Strategic Policy)

6.252 Policy STC3: Supporting Active Travel (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 8: Sustainable Travel because it outlines the improvements that will be made to existing active travel routes, in addition to outlining extensions to the existing walking and cycling network. This will help reduce air and noise pollution associated with use of the private car. For this reason, a minor positive effect is expected in relation to SA Objective 9: Pollution. A significant positive effect is expected in relation to SA Objective 1: Climate Change as supporting improvements to the active travel network will offer increased opportunities for more sustainable travel. This could reduce reliance on the private car and associated transport emissions, mitigating the effects of climate change. A minor positive effect is also expected in relation to SA Objective 3: Economic Growth because prioritising the active travel network through enhancements and new provision will encourage walking and cycling, helping to reduce emissions associated with use of the private car and helping to achieve a low carbon economy.

6.253 Minor positive effects are also expected in relation to SA Objective 4: Health and SA Objective 6: Community because of the requirement for major development proposals to incorporate enclosed parking/storage for cycles and bikes, which will encourage the take up of cycling increasing pedestrian activity and interaction between different groups of people, with beneficial effects on people's health and wellbeing. In addition, the Policy supports active travel routes linking development with key destinations and community facilities as well as from the city centre to surrounding rural areas. This will have a positive impact on communities as well as increase access for residents to services and facilities, resulting in a minor positive effect is expected in relation to SA Objective 7: Services, Facilities and Education. Minor positive effects are also expected in relation to SA Objective 5: Design and the Built Environment and SA Objective 10: Biodiversity and Geodiversity because the Policy seeks to create a safe, comfortable and attractive walking and cycling environment through place-making, which involves enhancements to the public realm, street planting and biodiversity.

6.254 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.255 One reasonable alternative has been considered to Policy STC3: Supporting Active Travel (Strategic Policy):

- Reasonable Alternative 1: Identify other routes – This option would support a different series of proposals which would be less likely to benefit from Devon County Council support (the County Council has provided significant input into the Policy).

6.256 Reasonable Alternative 1 has a similar intention to Policy STC3 in that it seeks to support more active travel but would identify different routes to those identified in Policy STC3. This could result in withdrawn support from Devon County Council who had significant input into the wording of Policy STC3. As such, the effects are likely to match those identified under Policy STC3 but would all be uncertain. Therefore, overall, a significant positive but uncertain effect are expected in relation to SA Objective 8: Sustainable Travel and SA Objective 1: Climate Change, whilst minor positive but uncertain effects are expected in relation to SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 6: Community, SA Objective 9: Pollution and SA Objective 10: Biodiversity and Geodiversity. Negligible effects are expected against the remaining SA objectives.

Policy STC4: Supporting Public Transport (Strategic Policy)

6.257 Policy STC4: Supporting Public Transport (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 8: Sustainable Travel because it promotes travel via public transport by requiring enhancements to bus and rail provision within the city, in addition to multi-modal

provision at mobility hubs. The Policy also requires major development to be located near public transport links or provide new links to public transport. Encouraging travel via public transport will help reduce pollution associated with use of the private car. Therefore, a minor positive effect is expected in relation to SA Objective 9: Pollution. Promoting travel via public transport will also support the transition away from the use of the private car and associated transport emissions. This will have a positive impact on mitigating the effects of climate change. Therefore, a significant positive effect is expected in relation to SA Objective 1: Climate Change.

6.258 A minor positive effect is expected in relation to SA Objective 4: Health as encouraging the use of public transport will help to improve access to key services and facilities for all along with having positive impacts on air quality as a result of lower private car -related transport emissions. A minor positive effect is expected in relation to SA Objective 5: Design and the Built Environment as the Policy requires major development to provide densities, layouts and design which allows for the provision of public transport.

6.259 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.260 One reasonable alternative has been considered to Policy STC4: Supporting Public Transport (Strategic Policy):

- Reasonable Alternative 1: Identify other routes – This option would support a different series of proposals which would be less likely to benefit from Devon County Council support (the County Council has provided significant input into the Policy).

6.261 Reasonable Alternative 1 has a similar intention to Policy STC4 in that it seeks to support public transport use but would identify a different series of proposals to those identified in Policy STC4. As such, the effects are likely to match those identified under Policy STC4 but would all be uncertain. Therefore, overall, a significant positive but uncertain effect are expected in relation to SA

Objective 1: Climate Change and SA Objective 8: Sustainable Travel and a minor positive but uncertain effect are expected in relation to SA Objective 4: Health and SA Objective 9: Pollution. Negligible effects are expected against the remaining SA objectives.

Policy STC5: Supporting more Sustainable Forms of Car Use

6.262 Policy STC5: Supporting more Sustainable Forms of Car Use is expected to have significant positive effects in relation to SA Objective 1: Climate Change, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because it seeks to make provision for electric vehicles and shared mobility, thereby facilitating an increase in their usage and reduction in private petrol/diesel vehicle use. This would result in a reduction of transport-related pollution, including carbon dioxide emissions. However, the Policy also supports the provision of car parking spaces, which could facilitate car usage generally. However, the Policy supports car-free and low-car development in the city-centre that is required to have high quality active travel public transport and shared mobility. This would also reduce petrol/diesel vehicle use and increase usage of sustainable and active travel modes, further reducing transport-related pollution and carbon dioxide emissions. A reduction in pollution, alongside an increase in use of active travel modes would improve residents' health and wellbeing in Exeter, therefore a significant positive effect is identified in relation to SA objective 4: Health.

6.263 A minor positive effect is expected in relation to SA Objective 5: Design and the Built Environment as the Policy requires car parking to be integrated into the overall design of proposals, creating well-designed street scenes and ensuring high quality public realm.

6.264 A minor positive effect is expected in relation to SA Objective 6: Community as the Policy supports car-free and low-car development in the city-centre that is required to have high quality active travel public transport and shared mobility. This will help to deliver cohesive neighbourhoods in Exeter with

high levels of pedestrian activity/outdoor interaction. In addition, requirements for shared mobility and sustainable transport and active travel provision will help meet the needs and improve access to services and facilities (including education and employment areas) for all of Exeter's residents, including those who can't drive, are young, elderly or disabled. Therefore, a minor positive effect is identified for SA objective 7: Services, Facilities and Education.

6.265 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.266 Two reasonable alternatives have been considered to Policy STC5: Supporting more Sustainable Forms of Car Use:

- Reasonable Alternative 1: Less support for more sustainable forms of car use and alternative forms of parking – This option would be likely to lead to car-dominated developments. This would not support ambitions for improved health and wellbeing, development quality nor net zero.
- Reasonable Alternative 2: More restrictive approach to parking – This may provide greater support to active travel and net zero, however it could restrict equitable access to local facilities and jobs and could result in significant parking issues away from the development site if parking is displaced.

6.267 Reasonable Alternative 1 would provide less support for more sustainable forms of car use and alternative forms of parking. This would result in a reduced uptake in electric vehicles and shared mobility, and this along with the policies support for car and motorcycle parking would result in increased private car. Increased private car use could lead to an increase in transport-related emissions. Reasonable Alternative 1 would create more car-dependent development in the city-centre. Therefore, minor negative effects are expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. This will inhibit the delivery of cohesive neighbourhoods in Exeter with lower levels of pedestrian activity/outdoor interaction, resulting in a minor negative effect in

relation to SA Objective 6: Community. However, requirements for sustainable transport and active travel provision will help meet the needs and improve access to services and facilities (including education and employment areas) for all of Exeter's residents, including those who can't drive, are young, elderly or disabled, resulting in a minor positive effect in relation to SA Objective 7: Services, Facilities and Education. Negligible effects are expected against the remaining SA objectives.

6.268 Reasonable Alternative 2 seeks to have a more restrictive approach to parking. This would result in a greater uptake of sustainable forms of transport, including active travel modes, reducing transport-related pollution, including GHG emissions. Lower transport related emissions will have a positive effect on health. Overall, significant positive effects are expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health and SA Objective 9: Pollution. Reasonable Alternative 2 will encourage the use of the sustainable transport methods but could lead to significant parking issues resulting in significant positive and minor negative effect in relation to SA Objective 8: Sustainable Travel. A more restrictive approach to parking could reduce access to services and facilities and employment opportunities for those who are reliant on private vehicles to travel. Therefore, minor negative effects are expected in relation to SA Objective 3: Economic growth and SA objective 7: Services, Facilities and Education. Negligible effects are expected against the remaining SA objectives.

Policy STC6: Travel Plans

6.269 Policy STC6: Travel Plans is expected to have significant positive effects in relation to SA Objective 1: Climate Change, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as the Travel Plans aim to identify how development will minimise car travel. The reduction in car travel facilitated by the Travel Plans will result in a reduction in private vehicle use and thus decrease transport-related pollution. In addition, the Policy outlines that Travel Plans will consider infrastructure and facilities to support sustainable transport, multi-modal parking and incentives for using sustainable transport. This will increase uptake of sustainable transport and active travel modes, further

decreasing car use and reducing transport-related pollution. In addition, such a reduction in pollution, alongside an increase in use of active travel modes would improve residents' health and wellbeing in Exeter, therefore a significant positive effect is identified in relation to SA objective 4: Health.

6.270 A minor positive effect is identified in relation to SA objective 7: Services, Facilities and Education as the Policy outlines that Travel Plans will consider the location of nearby facilities and services, alongside the consideration of infrastructure and facilities to support sustainable transport, multi-modal parking and incentives for using sustainable transport. This will likely result in developments meeting the needs of residents and improving access to services and facilities, including for those who are disadvantaged.

6.271 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.272 No reasonable alternatives have been considered to Policy STC6: Travel Plans.

Policy STC7: Safeguarding Transport Infrastructure

6.273 Policy STC7: Safeguarding Transport Infrastructure is expected to have significant positive effects in relation to SA Objective 1: Climate Change, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because the Policy safeguards land for active travel routes as well as for a railway station on the Exeter to Exmouth line and rail freight infrastructure near Exeter St David's Station. Transport infrastructure improvements are also proposed at the Exeter Ship Canal. This will reduce private vehicle use by encouraging more people to travel via sustainable modes. This will reduce transport-related pollution including carbon dioxide emissions. A reduction in pollution, alongside an

increase in use of active travel modes would improve residents' health and wellbeing in Exeter, therefore a significant positive effect is identified in relation to SA Objective 4: Health.

6.274 A minor positive effect is identified for SA Objective 6: Community as the Policy promotes the provision of active travel routes and a new railway station. This will help to deliver cohesive neighbourhoods in Exeter with high levels of pedestrian activity/outdoor interaction. In addition, requirements for shared mobility, sustainable transport and active travel provision will help meet the needs and improve access to services and facilities (including education and employment areas) for all of Exeter's residents, including those who can't drive, are young, elderly or disabled. Therefore, a minor positive effect is identified for SA objective 7: Services, Facilities and Education.

6.275 A minor negative effect is identified for this Policy in relation to SA objective 10: Biodiversity and Geodiversity as the provision of new transport infrastructure may result in negative impacts on Exeter's biodiversity, such as habitat destruction, degradation or fragmentation. However, it is assumed that any infrastructure proposals would be subject to Environmental Impact Assessment as required.

6.276 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.277 One reasonable alternative has been considered to Policy STC7: Safeguarding Transport Infrastructure:

- Reasonable Alternative 1: Policy safeguarding only land and not structures – This option would not provide sufficient protection of infrastructure requirements for walking and cycling (it is these modes which would be provided for by safeguarding of access through embankments, disused rail lines etc) which would undermine health and wellbeing and net zero ambitions.

6.278 Reasonable Alternative 1 is expected to have negligible effects in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 6: Community, SA objective 7: Services, Facilities and Education, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as it will only safeguard land and not structures which may not provide sufficient protection of infrastructure requirements for walking and cycling. The lack of opportunities for walking and cycling could lead to the continued use of the private car and the release of carbon dioxide emissions. Reasonable alternative 1 is also not likely to improve air quality or have a positive impact on health and wellbeing with the lack of walking and cycling opportunities. Negligible effects are expected against the remaining SA objectives.

Policy STC8: Motorway Service Area

6.279 Policy STC8: Motorway Service Area is expected to have a significant positive effect in relation to SA Objective 3: Economic Growth as the Policy supports the creation of more employment space which will help to meet the economic needs of Exeter.

6.280 A minor negative effect is identified in relation to SA objective 1: Climate Change as the employment area will be accessed by the motorway, which will likely encourage car travel, resulting in increased transport-related pollution, including carbon dioxide emissions, as well as associated health impacts. However, providing the motorway services elsewhere will potentially reduce overall congestion at Junction 30 having a positive impact on associated emissions. It will also help buses to run smoother, improving the efficiency of bus services. Therefore, mixed effects (minor positive and minor negative) are identified in relation to SA Objective 4: Health, SA Objective 8: Sustainable Transport and SA Objective 9: Pollution.

6.281 A minor negative effect is expected in relation to SA objective 7: Services, Facilities and Education as the development of the motorway service area will result in the removal of existing services and facilities.

6.282 The Policy will result in the redevelopment of brownfield land, aiding in the efficient use of resources in Exeter. Therefore, a minor positive effect is identified for SA objective 14: Resources.

6.283 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.284 No reasonable alternatives have been considered to Policy STC8: Motorway Service Area.

Policy STC9: Digital Communications (Strategic Policy)

6.285 Policy STC9: Digital Communications (Strategic Policy) is expected to have a significant positive effect against SA Objective 3: Economic Growth because it seeks to facilitate economic growth through improvements to the digital communications infrastructure, including full fibre connectivity and next generation mobile connectivity. All major development proposals are expected to incorporate digital infrastructure as one of the essential utilities, in addition to providing a network of open access ducting (open to all fibre providers). Development proposals of at least 500 dwellings (or five hectares of employment land) or more will always provide at least two separate external connections to ensure coverage standards.

6.286 An improved digital communications network will support more flexible working patterns, such as working from home. This has the potential to reduce people's need to travel into work, often by the private car which can generate noise and air pollution. Therefore, minor positive effects are expected in relation to SA Objective 8: Sustainable Travel and SA Objective 9: Pollution.

6.287 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.288 No reasonable alternatives have been considered to Policy STC9: Digital Communications (Strategic Policy).

Natural Environment

6.289 This section presents the appraisals of the following Exeter Plan policies:

- Policy NE1: Landscape Setting Areas (Strategic Policy)
- Policy NE2: Valley Parks (Strategic Policy)
- Policy NE3: Biodiversity (Strategic Policy)
- Policy NE4: Green Infrastructure (Strategic Policy)
- Policy NE5: Green Circle
- Policy NE6: Urban Greening Factor
- Policy NE7: Urban Tree Canopy Cover

6.290 The likely effects of the policies in relation to each SA objective are shown in Table 6.8 and described below the table.

Table 6.8: Summary of SA findings for the Natural Environment Policies

SA Objectives	Policy NE1	Policy NE2	Policy NE3	Policy NE4	Policy NE5	Policy NE6	Policy NE7
SA1: Climate Change	+	+	+	+	0	+	+
SA2: Housing	-?	-?	-?	0	0	0	0
SA3: Economic Growth	0	0	0	0	0	0	0
SA4: Health	0	+	+	+	++	+	+
SA5: Design and the Built Environment	0	0	0	0	0	+	+
SA6: Community	0	0	0	0	++	0	0
SA7: Services, Facilities and Education	0	0	0	0	0	0	0
SA8: Sustainable Travel	0	+	0	+	+	0	0
SA9: Pollution	0	+	0	+	0	+	+
SA10: Biodiversity and Geodiversity	+	++	++	++	0	++	+?
SA11: Landscape	++	+	0	+	0	+	+
SA12: Cultural Heritage	0	0	0	0	0	0	0
SA13: Water	+	+	0	0	0	+	+
SA14: Resources	0	0	0	0	0	0	0

Policy NE1: Landscape Setting Areas (Strategic Policy)

6.291 Policy NE1: Landscape Setting Areas (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 11: Landscape because it seeks to protect and enhance the distinctive landscape within Exeter. The Policy only permits development within the Landscape Setting Areas if certain criteria are met, as outlined in the policy.

6.292 Minor positive effects are also expected in relation to SA Objective 1: Climate Change and SA Objective 13: Water as the Policy permits development that aims to manage flood risk and deliver other forms of climate resilience. This could help Exeter city in adapting to the impacts of a changing climate.

6.293 A minor negative effect is possible in relation to SA Objective 2: Housing as it is possible that the Policy requirements could prove restrictive to housing delivery depending on the location of proposals.

6.294 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.295 One reasonable alternative has been considered to Policy NE1: Landscape Setting Areas (Strategic Policy):

- Reasonable Alternative 1: Less restrictive Policy that does not prevent harm of the landscape setting areas – This option would not be effective in protecting the distinctive characteristics, special features and qualities that make these valued landscapes sensitive to development.

6.296 Reasonable Alternative 1 is expected to have a minor positive effect in relation to SA Objective 11: Landscape because although it would seek to protect the landscape, it would not protect the distinctive characteristics, special features and qualities of the landscape. Negligible effects are expected against the remaining SA objectives.

Policy NE2: Valley Parks (Strategic Policy)

6.297 Policy NE2: Valley Parks (Strategic Policy) is expected to have a minor positive effect in relation to SA Objective 11: Landscape as the policy will ensure the protection of Valley Parks by ensuring development proposals will not cause unacceptable harm.

6.298 A significant positive effect is expected in relation to SA Objective 10: Biodiversity and Geodiversity because in addition to supporting nature conservation and ecological enhancement, the policy also promotes environmental education.

6.299 Policy NE2 is expected to have a minor positive effect in relation to SA Objective 4: Health because it supports the development of recreation/Suitable Alternative Natural Greenspace, which encourages recreational use of the parks.

6.300 Minor positive effects are also expected in relation to SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because the Policy supports enhancements to active travel, which will reduce reliance on the private car and associated pollution.

6.301 A minor positive effect is also expected against SA Objective 13: Water because support is given to managing flood risk. The management of flood risk will also support climate resilience. The policy also aims to achieve net zero through development proposals in the Valley Parks. Therefore, a minor positive effect is expected in relation to SA Objective 1: Climate Change.

6.302 A minor negative effect is possible in relation to SA Objective 2: Housing as it is possible that the Policy requirements could prove restrictive to housing delivery depending on the location of proposals, cost efficiency, and deliverability.

6.303 Negligible effects are expected against the remaining SA objective.

Reasonable Alternatives

6.304 Three reasonable alternatives have been considered to Policy NE2: Valley Parks (Strategic Policy):

- Reasonable Alternative 1: Less restrictive Policy that does not prevent development that would harm the valley parks – This option would not be effective in protecting the Valley Parks and the opportunities they afford.
- Reasonable Alternative 2: Policy could omit a requirement for new development to consider sustainable access to the Valley Parks – This would not take full advantage of this green space, could adversely impact on the South East Devon European Site Mitigation Strategy, could be more likely to result in increases in car trips and would not provide such potential to minimise health inequalities.
- Reasonable Alternative 3: Policy could require all development to consider access to Valley Parks – This does not seem appropriate as it could impact on viability for smaller scale development which may be some distance from the Valley Parks.

6.305 Reasonable Alternative 1 would not prevent development that would harm the landscape of the Valley Parks and the recreational use of the parks. Therefore, significant negative but uncertain effects are expected in relation to SA Objective 4: Health and SA Objective 11: Landscape.

6.306 With there being no limit on development that would harm the Valley Parks, residential or employment development could come forwards within the Valley Parks. Therefore, minor positive but uncertain effects are expected in

relation to SA Objective 2: Housing, SA Objective 3: Economic Growth and SA Objective 7: Services, Facilities and Education. However, this could have adverse effects on biodiversity and flood risk, in addition to enabling development on greenfield land. Therefore, significant negative but uncertain effects are expected in relation to SA Objective 10: Biodiversity and SA Objective 13: Water and a minor negative effect is expected in relation to SA Objective 14: Resources. A minor negative effect is expected in relation to SA Objective 6: Community because the potential loss of the Valley Parks to development would result in a reduction in outdoor space and subsequent outdoor informal interactions between residents. Negligible effects are expected against the remaining SA objectives.

6.307 Reasonable Alternative 2 is expected to have minor negative effects in relation to SA Objective 8: Sustainable Travel and SA Objective 9: Pollution because it would not support access to the Valley Parks via active travel and may instead encourage people to travel via car, with adverse effects on pollution. Negligible effects are expected against the remaining SA objectives.

6.308 Reasonable Alternative 3 is expected to have a minor negative but uncertain effect in relation to SA Objective 2: Housing because although it would require all new development proposals to incorporate sustainable access to the Valley Parks, this could result in smaller housing sites not coming forwards due to viability. This option would, however, result in minor positive effects in relation to SA Objective 8: Sustainable Travel and SA Objective 9: Pollution due to the emphasis on active travel. Negligible effects are expected against the remaining SA objectives.

Policy NE3: Biodiversity (Strategic Policy)

6.309 Policy NE3: Biodiversity (Strategic Policy) is expected to have a significant positive effect in relation to SA Objective 10: Biodiversity and Geodiversity because the Policy requires a net gain in biodiversity. In addition, it does not permit any development likely to have an adverse impact on the integrity of International or National Sites of Importance and only permits

development likely to have an impact on other known sites of biodiversity interest if certain criteria are met, as outlined in the policy. The Policy seeks to preserve, connect, restore and create wildlife habitats, corridors and networks and any other features of ecological interest, as well as requiring development proposals to follow the mitigation hierarchy, providing at least 10% (or the legally defined “relevant percentage”) Biodiversity Net Gain on-site where possible, but elsewhere if not. In addition, the level of biodiversity enhancements proposed through the policy will also support climate change resilience and adaptation through urban cooling and flood risk mitigation. Therefore, a minor positive effect is expected in relation to SA Objective 1: Climate Change.

6.310 The Policy is expected to have a minor positive effect against SA Objective 4: Health because it seeks to improve the natural environment, which has the potential to enhance people’s health and wellbeing by providing attractive surroundings, cleaning the air up and encouraging outdoor recreational activities.

6.311 A minor negative effect is possible in relation to SA Objective 2: Housing as it is possible that the Policy requirements could prove restrictive to housing delivery depending on the location of proposals.

6.312 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.313 One reasonable alternative to Policy NE3: Biodiversity (Strategic Policy) has been considered:

- Reasonable Alternative 1: Less restrictive Policy that does not set out requirements relating to new development – There would be risks associated with failing to meet legislative requirements under the Habitat Regulations together with a loss in biodiversity to the detriment of the ecosystem, residents (including adverse impacts on health and wellbeing) and negative impacts on the Council’s ambition for net zero.

6.314 Reasonable Alternative 1 would be a less restrictive version of Policy NE3 that does not set out biodiversity requirements relating to new development. Therefore, a minor positive effect is expected in relation to SA Objective 10: Biodiversity and Geodiversity. A minor positive effect is also expected in relation to SA Objective 4: Health, but to a lesser extent than that recorded under Policy NE3. Negligible effects are expected against the remaining SA objectives.

Policy NE4: Green Infrastructure (Strategic Policy)

6.315 A significant positive effect is expected for Policy NE4: Green Infrastructure (Strategic Policy) against SA Objective 10: Biodiversity and Geodiversity because the Policy seeks to protect the existing green infrastructure network and support the delivery of new green infrastructure, which comprises numerous ecosystems.

6.316 Green infrastructure networks often comprise walking and cycling routes and according to the policy, all large-scale development proposals will need to demonstrate the sustainable transport links they have to existing green infrastructure, including the Valley Parks and the Exeter Green Circle. This will encourage walking and cycling and reduce pollution associated with use of the private car, whilst also having beneficial effects on people's health and wellbeing. In addition, the creation of green infrastructure will support climate change resilience and mitigation. Therefore, minor positive effects are expected against SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution.

6.317 A minor positive effect is also expected in relation to SA Objective 11: Landscape because green infrastructure will benefit the overall character and appearance of Exeter and the setting of built development.

6.318 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.319 Three reasonable alternatives have been considered to Policy NE4: Green Infrastructure (Strategic Policy):

- Reasonable Alternative 1: Less restrictive Policy that does not protect GI or does not try to support the delivery of new GI in accordance with the GI strategy – This could result in the loss of GI to the detriment of residents (including adverse impacts on health and wellbeing and increased flood risk), losses of biodiversity, negative impacts on the Council's ambition for net zero, could be more likely to result in increases in car trips and would not provide such potential to minimise health inequalities.
- Reasonable Alternative 2: Policy could omit the requirement for new development to consider sustainable transport links to GI – This would not take full advantage of the green infrastructure and would be to the detriment of residents of new development.
- Reasonable Alternative 3: Policy could require all development to consider access to GI – This does not seem appropriate as it could impact on viability for smaller scale development.

6.320 Reasonable Alternative 1 is expected to have a minor positive effect in relation to SA Objective 10: Biodiversity and Geodiversity because although it would not support the protection of green infrastructure or the delivery of new green infrastructure, it is assumed that it would still seek to enhance existing green infrastructure. This could have beneficial effects on people's health although to a lesser extent than Policy NE4. For this reason, a minor positive effect is expected against SA Objective 4: Health but to a lesser extent than Policy NE4. Negligible effects are expected against the remaining SA objectives.

6.321 Reasonable Alternative 2 is expected to have a significant positive effect in relation to SA Objective 10: Biodiversity and Geodiversity because like Policy NE4, it seeks to protect and enhance the existing green infrastructure network and support the delivery of new green infrastructure, which comprises numerous ecosystems. The option is expected to have a minor positive effect

against SA Objective 4: Health because there are many health and wellbeing benefits associated with green infrastructure, some of which are outlined in the appraisal of Policy NE4.

6.322 Although this option would not require new developments to consider sustainable transport links to green infrastructure, the actual presence of the green infrastructure network, which comprises walking and cycling routes, is likely to increase active travel and reduce reliance on the private car. Therefore, minor positive effects are expected against SA Objective 8: Sustainable Travel and SA Objective 9: Pollution but to a lesser extent than those recorded against Policy NE4. Negligible effects are expected against the remaining SA objectives.

6.323 Reasonable Alternative 3 requires all new development proposals to consider access to green infrastructure. Therefore, this option is expected to have the same effects as those recorded against Policy NE4. Therefore, a significant positive effect is expected in relation to SA Objective 10: Biodiversity and Geodiversity and minor positive effects are expected in relation to SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution. However, minor negative but uncertain effects are expected in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth because requiring all developments to consider access to green infrastructure may result in those developments becoming unviable.

Policy NE5: Green Circle

6.324 The aim of the Green Circle is to link communities and provide a recreational route. This will improve connections between communities allowing better integration and socialising. Offering opportunities for recreation and exercising within green infrastructure will help improve physical health and wellbeing offering more opportunities for physical activity. Therefore, significant positive effects are expected against SA Objective 4: Health and SA Objective 6: Community.

6.325 Linking communities in a sustainable way may encourage the use of walking and cycling to support movement between communities. This could help the transition away from the private vehicles. Therefore, a minor positive effect is expected in relation to SA Objective 8: Sustainable Travel. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.326 No reasonable alternatives have been considered to Policy NE5: Green Circle.

Policy NE6: Urban Greening Factor

6.327 The Urban Greening Factor is a planning tool to improve the provision of Green Infrastructure particularly in urban areas. A significant positive effect is expected for Policy NE6 against SA Objective 10: Biodiversity and Geodiversity because the Policy seeks to improve the provision of green infrastructure, which comprises numerous ecosystems.

6.328 The development of green infrastructure, will have beneficial effects on people's health and wellbeing by providing spaces for recreation. Therefore, a minor positive effect is expected against SA Objective 4: Health. Improving the provision of green infrastructure is also expected to have minor positive effects on SA Objective 1: Climate Change and SA Objective 9: Pollution as the provision of green infrastructure will support climate change resilience and adaptation.

6.329 A minor positive effect is also expected in relation to SA Objective 11: Landscape because improving green infrastructure will benefit the overall character and appearance of Exeter and the setting of built development. This will also have a minor positive effect in relation to SA Objective 5: Design and Built Environment through enhancements to the built environment.

6.330 A minor positive effect is expected against SA Objective 13: Water as incorporating green infrastructure could include tree planting which could reduce the levels of surface water flooding with an increasing number of trees available to take up water. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.331 One reasonable alternative has been considered to Policy NE6: Urban Greening Factor:

- Reasonable Alternative 1: Different target factor scores – This option would go against Natural England guidance and there is a lack of evidence to adopt different standards.

6.332 Reasonable Alternative 1 supports different target factor scores. This option would not comply with guidance set out by Natural England and could result in a lower provision of green infrastructure. However, Reasonable alternative 1 would likely still result in a level of green infrastructure provision within major developments. Therefore, minor positive effects are expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 5: Design and Built Environment, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, and SA Objective 11: Landscape and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

Policy NE7: Urban Tree Canopy Cover

6.333 Increasing tree canopy cover will have a minor positive effect against SA Objective 1: Climate change as trees absorb carbon dioxide emissions which help address climate change by lowering emissions. Subsequently, lowering carbon dioxide emissions will help improve air quality within Exeter resulting in minor positive effect against SA Objective 9: Pollution. A minor positive effect is

also expected for SA Objective 4: Health as improving air quality will have a positive impact on human health.

6.334 A minor positive effect is expected against SA Objective 5: Design and the Built Environment as incorporating street trees and increasing tree canopy cover within a development proposal will have a positive impact on the townscape. Therefore, a minor positive effect is expected for SA Objective 11: Landscape. There is potential for a minor positive effect in relation to SA Objective 10: Biodiversity and Geodiversity as increasing tree canopy cover could offer more wildlife habitats. However, there is a degree of uncertainty as it is dependent on the type of trees that are planted and whether there are likely to support wildlife habitats such as bird nests.

6.335 A minor positive effect is expected against SA Objective 13: Water as increasing tree canopy cover could reduce the levels of surface water flooding with an increasing number of trees available to take up water. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.336 One reasonable alternative has been considered to Policy NE7: Urban Tree Canopy Cover:

- Reasonable Alternative 1: No Policy - This option would not maximise opportunities to provide green enhancements to development sites. This option has not been subject to SA as it is not considered to be reasonable.
- Reasonable Alternative 2: Less restrictive Policy – Without a clear statement that development that the loss of overall tree canopy cover will not be permitted, the tree canopy cover could actually decrease.
- Reasonable Alternative 3: More restrictive Policy – Reference to a percentage uplift target is problematic due to the lack of evidence to substantiate this and the implications for deliverability of development on some key brownfield sites.

6.337 A less restrictive Policy through Reasonable Alternative 2 could result in the loss of tree canopy through development proposals by not providing adequate protection for tree canopy cover. This could have negative effects across a number of the SA objectives as increasing tree canopy cover can have positive effects in relation to mitigating climate change, minimising flood risk, positive impact on townscape and improving air quality. Therefore, minor negative effects would be expected in relation to SA Objective 1: Climate change, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

6.338 Reasonable Alternative 3 proposes a more restrictive Policy which would include reference to a percentage uplift target for tree canopy cover for development site. The requirement for a specific uplift target could impact in the deliverability of development sites, particularly some brownfield sites. Therefore, there could be minor negative effects in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth. However, Reasonable Alternative 3 would still support increasing tree canopy cover across Exeter City and therefore, minor positive effects are expected across SA Objective 1: Climate change, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

History and Heritage

6.339 This section presents the appraisal of the following Exeter Plan policy:

- Policy HH1: Conserving and enhancing Heritage Assets (Strategic Policy)
- Policy HH2: Conservation Areas
- Policy HH3: Archaeology
- Policy HH4: Heritage Assets and Climate Change

■ Policy HH5: Conserving and enhancing Exeter City Walls

6.340 The likely effects of the Policy in relation to each SA objective are shown in Table 6.9 and described below the table.

Table 6.9: Summary of SA findings for the History and Heritage Policy

SA Objectives	Policy HH1	Policy HH2	Policy HH3	Policy HH4	Policy HH5
SA1: Climate Change	+	0	0	+	0
SA2: Housing	0	0	0	0	0
SA3: Economic Growth	0	0	0	0	0
SA4: Health	0	0	0	0	+
SA5: Design and the Built Environment	+	+	0	+	0
SA6: Community	0	0	0	0	0
SA7: Services, Facilities and Education	0	0	0	0	0
SA8: Sustainable Travel	0	0	0	0	0
SA9: Pollution	0	0	0	0	0
SA10: Biodiversity and Geodiversity	0	0	0	0	0
SA11: Landscape	0	0	0	0	0
SA12: Cultural Heritage	++	++	++	++/-	++
SA13: Water	0	0	0	0	0
SA14: Resources	0	0	0	0	0

Policy HH1: Conserving and enhancing Heritage Assets (Strategic Policy)

6.341 Policy HH1: Conserving and enhancing Heritage Assets (Strategic Policy) is likely to have a significant positive effect on SA Objective 12: Cultural Heritage because the policy's key aim is to conserve and enhance the historic environment, including the setting of heritage features. It promotes development that protects the city's cultural heritage, historic character and identifies, protects, and conserves the particular significance of designated and non-designated heritage assets and their settings. The Policy also promotes improved access to and interpretation of the historic environment.

6.342 The Policy is also expected to have a minor positive effect against SA Objective 5: Design and the Built Environment as the Policy aims to promote development that protects and enhances the unique historic character of the city and its built form.

6.343 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.344 One reasonable alternative has been considered to Policy HH1: Conserving and enhancing Heritage Assets (Strategic Policy):

- Reasonable Alternative 1: Separate policies covering designated assets, non-designated assets, or the different types of designation – This option would mean repetition without significant addition to the aim of the policy.

6.345 As the content of the Policy would remain the same, but it would be divided up into separate policies, the effects are expected to be the same. Therefore, a significant positive effect is expected against SA Objective 12: Cultural Heritage and minor positive effects are expected against SA Objective

1: Climate Change and SA Objective 5: Design and the Built Environment.
Negligible effects are expected against the remaining SA objectives.

Policy HH2: Conservation Areas

6.346 A significant positive effect is expected for Policy HH2: Conservation Areas in relation to SA Objective 12: Cultural Heritage as the Policy aims to conserve the distinctive character, special architectural value and historic significance of conservation areas, which will therefore aid in conserving Exeter's historic assets and their settings.

6.347 The Policy is also expected to have a minor positive effect against SA Objective 5: Design and the Built Environment as the Policy aims to promote development that protects the unique historic character of the city and its built form.

6.348 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.349 Three reasonable alternatives have been considered to Policy HH2: Conservation Areas:

- Reasonable Alternative 1: No Policy - This option would not provide sufficient Policy protection for conservation areas which provide significant areas of heritage and identity in Exeter and which are an important consideration due to the focus on brownfield development in the Exeter Plan. This option has not been subject to SA as it is not considered to be reasonable.
- Reasonable Alternative 2: Include protection of conservation areas within a single heritage policy. This would provide insufficient opportunity to address the impact of development on conservation areas which will be an

important consideration due to the focus on brownfield development in the Exeter Plan.

- Reasonable Alternative 3: Less restrictive Policy – A weaker Policy would not provide sufficient protection for conservation areas in Exeter.

6.350 Reasonable Alternative 2 would still ensure the protection of Conservation Areas. However, this would be incorporated into a single heritage policy. This approach would still provide some protection for Conservation Areas and help to conserve these areas although the level of protection may not be sufficient to protect and conserve Conservation Areas. Therefore, minor positive effects would be expected in relation to SA Objective 5: Design and the Built Environment and SA Objective 12: Cultural Heritage.

6.351 A less restrictive Policy through Reasonable Alternative 3 would still provide some protection for Conservation Areas and help to conserve these areas and their historical significance. However, a less restrictive Policy may not provide sufficient protection for Conservation Areas and therefore there could be an impact on the value and historic significance of these areas. Therefore, a minor rather than significant positive effect would be expected in relation to SA Objective 5: Design and the Built Environment and SA Objective 12: Cultural Heritage.

Policy HH3: Archaeology

6.352 Policy HH3: Archaeology is expected to have a significant positive effect in relation to SA Objective 12: Cultural Heritage as the Policy aims to protect archaeological remains and sites, monuments or structures of national archaeological importance and their settings. If preservation in situ is not feasible or appropriate, then any remains will be subject to a scheme of works.

6.353 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.354 Three reasonable alternatives have been considered to Policy HH3: Archaeology:

- Reasonable Alternative 1: No Policy - This option would not provide sufficient Policy protection against key archaeology assets. This is particularly important in Exeter which has significant potential archaeological potential while the Exeter is promoting a significant focus on brownfield development. This option has not been subject to SA as it is not considered to be reasonable.
- Reasonable Alternative 2: Include protection of archaeological remains within a single heritage policy. This would provide insufficient opportunity to address the varying significance of different types of remains.
- Reasonable Alternative 3: Less restrictive Policy – A weaker policy, particularly regarding nationally important remains, would not provide sufficient protection for archaeology in Exeter which has significant archaeological potential coupled with a significant focus on brownfield development.

6.355 Reasonable Alternative 2 would still support the protection of archaeological assets within Exeter City but within a single heritage policy. However, there is the potential that archaeological assets may not be as well-protected and a single Policy may not address the varying significance of different types of archaeological remains. Therefore, a minor positive effect would be expected in relation to SA Objective 12: Cultural Heritage.

6.356 A less restrictive Policy through Reasonable Alternative 3 may not provide sufficient protection for archaeological assets in Exeter City. However, the Policy would still provide some level of protection for these assets and therefore a minor positive effect would be expected in relation to SA Objective 12: Cultural Heritage.

Policy HH4: Heritage Assets and Climate Change

6.357 Policy HH4: Heritage Assets and Climate Change is generally supportive of development that makes a contribution to addressing climate change.

Development which affects designated heritage assets will be supported where the changes minimise harm and are sympathetic and consistent with the design and significance of the heritage asset and its setting. Development affecting non designated heritage assets will be supported assuming that they repair, retrofit and adaptively reuse historic buildings to minimise embodied carbon emissions, improve energy performance and adapt to climate change. Therefore, a minor positive effect is expected against SA Objective 1: Climate change. A minor positive effect is also expected in relation to SA Objective 5: Design and the Built Environment as the Policy ensures that development proposals that affect heritage assets should be sympathetic and consistent with the design of the heritage asset.

6.358 A significant positive effect is expected against SA Objective 12: Cultural Heritage as Policy HH4 ensures that any harm on a heritage asset from a development proposal is minimised and proposals must be sympathetic to the significance of the heritage asset and its setting. However, the Policy is also likely to have a minor negative effect (resulting in mixed effects overall) as the Policy does allow for a degree of harm to historic assets if the contribution to climate change outweighs the harm.

6.359 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.360 One reasonable alternative has been considered to Policy HH4: Heritage Assets and Climate Change:

- Reasonable Alternative 1: A Policy that offers greater weight to climate change would not offer sufficient strategy for the protection of the historic environment and balanced judgements.

6.361 Reasonable Alternative 1 supports the protection and conservation of heritage assets. However, greater weight is given to climate change which could result in harm to heritage assets and the local landscape as a result. A significant positive effect is expected in relation to SA Objective 1: Climate Change as the Reasonable Alternative would offer greater weight to climate change ensuring the adaptation to climate change. Minor negative effects are expected in relation to SA Objective 5: Design and the Built Environment, SA Objective 11: Landscape and SA Objective 12: Cultural Heritage. Negligible effects are expected against the remaining SA objectives.

Policy HH5: Conserving and enhancing Exeter City Walls

6.362 Policy HH5: Conserving and enhancing Exeter City Walls will ensure development proposals will not negatively impact the Exeter City Walls including its fabric and setting. In addition, where appropriate, contributions will be sought towards the maintenance, enhancement and interpretation of the City Walls. Therefore, a significant positive effect is expected against SA Objective 12: Cultural Heritage.

6.363 Minor positive effects are expected against SA Objective 4: Health as the Policy will require development proposals to improve access to the City Walls which could support increasing levels of physical activity. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.364 No reasonable alternatives have been considered to Policy HH5: Conserving and enhancing Exeter City Walls.

Culture and Tourism

6.365 This section presents the appraisal of the following Exeter Plan policies:

- Policy C1: Protecting and enhancing Cultural and Tourism Facilities (Strategic Policy)
- Policy C2: Development and Cultural Provision (Strategic Policy)

6.366 The likely effects of the policies in relation to each SA objective are shown in Table 6.10 and are described below the table.

Table 6.10: Summary of SA findings for the Culture and tourism Policies

SA Objectives	Policy C1	Policy C2
SA1: Climate Change	0	0
SA2: Housing	0	0
SA3: Economic Growth	++	0
SA4: Health	+	0
SA5: Design and the Built Environment	0	0
SA6: Community	0	+
SA7: Services, Facilities and Education	0	0
SA8: Sustainable Travel	0	0
SA9: Pollution	0	0
SA10: Biodiversity and Geodiversity	0	0
SA11: Landscape	0	0
SA12: Cultural Heritage	+	+

SA Objectives	Policy C1	Policy C2
SA13: Water	0	0
SA14: Resources	0	0

Policy C1: Protecting and enhancing Cultural and Tourism Facilities (Strategic Policy)

6.367 Policy C1: Protecting and enhancing Cultural and Tourism Facilities (Strategic Policy) is expected to have a significant positive effect against SA Objective 3: Economic Growth. The Policy recognises that cultural and tourism industries are of vital importance to the success of the city and supports proposals that enhance the cultural offering. The Policy is likely to support the prosperity and diversification of the city's economy, as well as the vitality of the city centre and local centres by encouraging activity that attracts visitors and footfall. The Policy is expected to have a minor positive effect in relation to SA Objective 12: Cultural Heritage because it seeks to promote access to and protect cultural facilities, which could include designated and non-designated heritage assets, although this is uncertain.

6.368 A minor positive effect is expected against SA Objective 4: Health as there are links between access to cultural and creative activities and improvements to the health and wellbeing of communities, particularly in relation to mental health. The Policy supports proposals that enhance and reflect Exeter's cultural and local identity in order to improve the environmental quality, liveability and economic success of the city. The Policy also promotes the temporary uses of sites such as public realm for cultural activities ensuring there will not be significant harm to local amenity. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.369 No reasonable alternatives have been considered to Policy C1: Protecting and enhancing Cultural and Tourism Facilities (Strategic Policy).

Policy C2: Development and Cultural Provision (Strategic Policy)

6.370 Policy C2: Development and Cultural Provision (Strategic Policy) will help enhance local culture with large-scale development proposals required to be accompanied by a cultural plan demonstrating how the development will contribute to local cultural provision. Therefore, a minor positive effect is expected in relation to SA Objective 6: Community. The Policy is also expected to have a minor positive effect in relation to SA Objective 12: Cultural Heritage as large-scale development proposals are required to demonstrate how the development would contribute to local cultural provision in proportion to the scale of development. Proposals are also required to be sensitive and sympathetic to local identity and cultural practises. A minor positive effect is expected against SA Objective 4: Health as there are links between access to cultural activities and improvements to the health and wellbeing of communities, particularly in relation to mental health. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.371 No reasonable alternatives have been considered to Policy C2: Development and Cultural Provision (Strategic Policy).

High Quality Places and Design

6.372 This section presents the appraisals of the following Exeter Plan policies:

- Policy D1: Design Principles (Strategic Policy)
- Policy D2: Designing-out Crime
- Policy D3: Advertisements

6.373 The likely effects of the policies in relation to each SA objective are shown in Table 6.11 and are described below the table.

Table 6.11: Summary of SA findings for the High Quality Places and Design Policies

SA Objectives	Policy D1	Policy D2	Policy D3
SA1: Climate Change	+	0	+
SA2: Housing	0	0	0
SA3: Economic Growth	+	0	0
SA4: Health	+	+	0
SA5: Design and the Built Environment	++	+	+
SA6: Community	+	++	+
SA7: Services, Facilities and Education	0	0	0
SA8: Sustainable Travel	+	0	0
SA9: Pollution	+	0	+
SA10: Biodiversity and Geodiversity	+	0	0
SA11: Landscape	+	0	+

SA Objectives	Policy D1	Policy D2	Policy D3
SA12: Cultural Heritage	+	0	+
SA13: Water	0	0	0
SA14: Resources	+	0	0

Policy D1: Design Principles (Strategic Policy)

6.374 A significant positive effect is expected against SA Objective 5: Design and the Built Environment as the central aim of the Policy is to ensure development proposals are encouraged to implement high quality design and placemaking and deliver visually attractive development and distinctive places, in addition to a high quality public realm that incorporates public art.

6.375 Policy D1: Design principles (Strategic Policy) is expected to have a minor positive effect in relation to SA Objective 1: Climate Change, as the Policy outlines that development proposals should integrate measures to appropriately address climate change mitigation and adaptation. The Policy also supports tree and vegetation planting that is climate change resilient. With regard to sustainable travel, the Policy specifically states that development proposals will be supported where they contribute to the provision of a mix of uses, which are compatible with one another. The provision of a mix of uses can reduce the need for people to travel elsewhere to reach certain amenities, as they may instead be all in one place. This reduces the need to travel and subsequent reliance on the private car, which can have the effect of minimising air and noise pollution associated with use of the private car. Therefore, minor positive effects are expected in relation to SA Objective 8: Sustainable Travel and SA Objective 9: Pollution.

6.376 The Policy is also expected to have a minor positive effect in relation to SA Objective 3: Economic Growth. This is because it ensures the creation of high quality, distinct places and the provision of a compatible mix of uses, which is likely to include employment uses, which complement each other to create

vital and viable places. This will likely support the vitality of Exeter's city centre and local centres by supporting mixed-use and high quality places.

6.377 Minor positive effects are expected for SA Objective 4: Health and SA Objective 6: Community as the Policy stipulates that development proposals should deliver a high quality public realm, which is likely to encourage pedestrian activity. Whilst the Policy is not specifically aimed at improving community cohesion or wellbeing, high quality public space and well-integrated development will help deliver cohesive neighbourhoods with opportunities for outdoor interaction that is inclusive for all. Additionally, a high quality environment can improve residents' health and wellbeing.

6.378 The Policy also outlines that retention, refurbishment and enhancement of existing buildings of high townscape and historic value will be supported and proposals should be sympathetic to local character and the historic environment. A robust and long-lasting framework is required which is informed by, and enhances, existing landscape features. The Policy also encourages the provision of landscape design. Therefore, minor positive effects are expected against SA Objective 11: Landscape and SA Objective 12: Cultural Heritage.

6.379 Lastly, a minor positive effect is expected in relation to SA Objective 10: Biodiversity and Geodiversity because the Policy states that development proposals will be supported where existing trees and vegetation of significant ecological and amenity value are retained and protected. The Policy also supports the planting of native trees throughout a development and in all streets.

6.380 A minor positive effect is expected in relation to SA Objective 14: Resources as the Policy encourages a layout and built form that makes efficient use of the site. This could minimise the take up of land for development.

6.381 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.382 Two reasonable alternatives have been considered to Policy D1: Design Principles (Strategic Policy). They are:

- Reasonable Alternative 1: Less detailed Policy – This would potentially result in lower quality development which is not a desirable outcome.
- Reasonable Alternative 2: More detailed Policy – This approach may be too prescriptive which could result in little flexibility for applicants which could, in turn, slow development delivery.

6.383 Reasonable Alternative 1 would set out less detailed design principles, which could potentially result in lower quality development. Therefore, a minor positive but uncertain effect is expected in relation to SA Objective 5: Design and the Built Environment. Due to the fact the specific design proposals under this reasonable alternative option are unknown, uncertain effects are expected in relation to SA Objective 1: Climate Change, SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 6: Community, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape, SA Objective 12: Cultural Heritage and SA Objective 14: Resources . Negligible effects are expected against the remaining SA objectives.

6.384 Reasonable Alternative 2 also seeks to deliver high quality design but would be more detailed than Policy D1. As was the case with Policy D1, a significant positive effect is expected in relation to SA Objective 5: Design and the Built Environment. Similarly, minor positive effects are expected in relation to SA Objective 1: Climate Change, SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 6: Community, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape, SA Objective 12: Cultural Heritage and SA Objective 14: Resources. However, the effects are recorded as uncertain because the exact details of this reasonable alternative option are unknown. Negligible effects are expected against the remaining SA objectives.

Policy D2: Designing-out Crime

6.385 A significant positive effect is expected in relation to SA Objective 6: Community as the Policy supports development proposals that will demonstrate that crime prevention and creating a safe environment have been integrated into design of the proposal. This will help to create cohesive neighbourhoods while creating safe environments with lower levels of fear of crime. The overall aim of the Policy is to reduce levels of crime. Clearly defining public and private realms will offer spaces for socialising and recreation that will support new and existing communities. This could have a minor positive effect in relation SA Objective 4: Health.

6.386 A minor positive effect is expected in relation to SA Objective 5: Design and the Built Environment as integrating crime prevention and creating a safe environment within a development will support high quality design and layout that incorporates appropriate lighting, security features and defined public realm. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.387 Two reasonable alternatives have been considered to Policy D2: Designing-out Crime:

- Reasonable Alternative 1: No Policy - This option would not provide sufficient depth in addressing issues of potential crime/ perception crime. This option has not been subject to SA as it is not considered to be reasonable.
- Reasonable Alternative 2: Include consideration of designing-out crime within the design policy. This would provide insufficient opportunity to address to issue in appropriate depth.

6.388 Reasonable Alternative 2 would still ensure that a safe environment is created within developments and that crime prevention is considered, and it would help enhance the feeling of being safe for residents. However,

incorporating the Policy as part of the design Policy may not as effectively result in consideration of crime prevention and creating a safe environment.

Therefore, minor rather than significant positive effects would be expected in relation to SA Objective 5: Design and the Built Environment and SA Objective 6: Community. A minor positive effect would be expected in relation to SA Objective 4: Health as the Policy would still help residents to feel more safe within their community and enhance accessibility within the community. Negligible effects are expected against the remaining SA objectives.

Policy D3: Advertisements

6.389 Policy D3: Advertisements is expected to have minor positive effect against SA Objective 1: Climate Change as the Policy states that digital advertising installations should generate on-site renewable energy where possible. However, there is a degree of uncertainty as it is unknown the level of renewable energy generation and the impact this will have in adapting to climate change.

6.390 A minor positive effect is expected against SA Objective 5: Design and the Built Environment as the central aim of the Policy is to ensure that proposals for advertisements do not harm amenity with the position, scale, materials and colour of the advertisement to be considered.

6.391 A minor positive effect is expected in relation to SA Objective 6: Community as the Policy supports taking public safety into account for proposals for advertisements. The lighting of an advertisement is required to be taken into account resulting in minor positive effect for SA Objective 9: Pollution.

6.392 Policy D3 is expected to have minor positive effects on SA Objective 11: Landscape and SA Objective 12: Cultural Heritage. The Policy stipulates that the character and historic, architectural and cultural significance of buildings and their settings should be considered when assessing advertisement proposals. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.393 No reasonable alternatives have been considered in relation to Policy D3: Advertisements.

Health and Wellbeing

6.394 This section presents the appraisal of the following Exeter Plan policies:

- Policy HW1: Health and Wellbeing (Strategic Policy)
- Policy HW2: Environmental Quality, Pollution and Contaminated Land

6.395 The likely effects of the policies in relation to each SA objective are shown in Table 6.12 and described below the table.

Table 6.12: Summary of SA findings for the Health and Wellbeing Policies

SA Objectives	Policy HW1	Policy HW2
SA1: Climate Change	0	+
SA2: Housing	0	0
SA3: Economic Growth	0	+
SA4: Health	++	+
SA5: Design and the Built Environment	0	0
SA6: Community	++	0
SA7: Services, Facilities and Education	+	+
SA8: Sustainable Travel	+	0

SA Objectives	Policy HW1	Policy HW2
SA9: Pollution	+	++
SA10: Biodiversity and Geodiversity	0	0
SA11: Landscape	0	0
SA12: Cultural Heritage	0	0
SA13: Water	0	0
SA14: Resources	0	+

Policy HW1: Health and Wellbeing (Strategic Policy)

6.396 Policy HW1 is likely to result in a significant positive effect for SA Objective 4: Health, as the Policy sets out how the Council aims to maximise opportunities for achieving positive mental and physical health, which includes contributions towards GP provision, as well as promoting active lifestyles and reducing environmental impacts on health. The Policy sets out the requirement for Health Impact Assessment (HIA) for larger developments, which must demonstrate how the proposal will promote community inclusion; support active lifestyles; have a positive impact on health and wellbeing; and, ensure public safety and minimise crime. Therefore, a significant positive effect is also expected in relation to SA Objective 6: Community.

6.397 Minor positive effects are expected against SA Objective 7: Services, Facilities and Education and SA Objective 8: Sustainable Travel as the Policy outlines that new health care facilities must be easily accessible by walking, cycling and public transport, and opportunities for co-location and multi-use of healthcare facilities with other services is supported. This has the potential to reduce the need to travel by private vehicle, and supports the provision of easily-accessible healthcare facilities for local communities. Reducing travel by

private vehicle may also help minimise air and noise pollution. Therefore, a minor positive effect is also expected in relation to SA Objective 9: Pollution.

6.398 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.399 One reasonable alternative has been considered in relation to Policy HW1: Health and Wellbeing (Strategic Policy):

- Reasonable Alternative 1: Omit the requirement for Health Impact Assessment (HIA) – This option would reduce the potential burden on applications, however, an HIA is considered best practice for larger applications and so no requirement could potentially result in poorer outcomes for health and wellbeing.

6.400 The content of this reasonable alternative option would remain the same as Policy HW1, other than the omission of the requirement for HIA. Minor positive effects are therefore expected in relation to SA Objective 4: Health and SA Objective 6: Community, as whilst the Policy retains its central aim of improving mental and physical health, larger developments would no longer require HIA which could result in poorer outcomes for health and wellbeing, and community inclusion. As was the case for Policy HW1, minor positive effects are expected in relation to SA Objective 7: Services, Facilities and Education, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution as the reasonable alternative would still include the requirement for good sustainable travel access for new healthcare facilities and the co-location and multi-use of health facilities with other services, improving access and reducing pollution associated with use of the private car. Negligible effects are expected against the remaining SA objectives.

Policy HW2: Environmental Quality, Pollution and Contaminated Land

6.401 Policy HW2 is likely to result in minor positive effect on SA Objective 1: Climate Change as it ensures that development is designed and constructed to minimise and then mitigate emissions which could have a positive effect on adapting to climate change. A minor positive effect is expected in relation to SA Objective 4: Health as development proposals are required not to have unacceptable impacts on environmental quality and pollution levels including air, noise and light. This could have a positive impact on human health by preventing rises in air and noise pollution. Development proposals are also required to not have an unacceptable impact on existing business or facilities. Therefore, minor positive effects are expected in relation to SA Objective 3: Economic Growth and SA Objective 7: Services, Facilities and Education as this will ensure the continued function of these businesses and services and not result in any loss of service provision.

6.402 A significant positive effect is expected against SA Objective 9: Pollution as the Policy requires all development proposals to be designed and constructed to minimise light, dust, vibration and noise pollution. This will result in less impacts on air quality, noise levels, water quality and soil as a result of development. A minor positive effect is expected in relation to SA Objective 14: Resources as the Policy supports development proposals on land affected by contamination or pollution or poor standards of amenity where certain criteria are met. This includes making the land suitable for the proposed use and mitigating any unacceptable impacts. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.403 No reasonable alternatives have been considered in relation to Policy HW2: Environmental Quality, Pollution and Contaminated Land.

Infrastructure and Facilities

6.404 This section presents the appraisals of the following Exeter Plan policies:

- Policy IF1: Delivery of Infrastructure (Strategic Policy)
- Policy IF2: Viability (Strategic Policy)
- Policy IF3: Community Facilities (Strategic Policy)
- Policy IF4: Open Space, Play Areas, Allotments and Sport
- Policy IF5: New Cemetery Provision

6.405 The likely effects of the policies in relation to each SA objective are shown in Table 6.13 and described below the table.

Table 6.13: Summary of SA findings for the Infrastructure and Facilities Policies

SA Objectives	Policy IF1	Policy IF2	Policy IF3	Policy IF4	Policy IF5
SA1: Climate Change	+	+/-?	0	0	0
SA2: Housing	0	+/-?	+	+	0
SA3: Economic Growth	+	+/-?	0	0	0
SA4: Health	+	+/-?	++	++	+
SA5: Design and the Built Environment	+	+/-?	0	+	0
SA6: Community	+	+/-?	++?	++	0
SA7: Services, Facilities and Education	+	+/-?	++?	0	0
SA8: Sustainable Travel	+	+/-?	+	+	0

SA Objectives	Policy IF1	Policy IF2	Policy IF3	Policy IF4	Policy IF5
SA9: Pollution	+?	+/-?	+?	0	+
SA10: Biodiversity and Geodiversity	0	+/-?	0	0	+
SA11: Landscape	0	+/-?	0	0	+
SA12: Cultural Heritage	0	+/-?	0	0	+
SA13: Water	+?	+/-?	0	0	+
SA14: Resources	0	+/-?	0	0	0

Policy IF1: Delivery of Infrastructure (Strategic Policy)

6.406 Policy IF1: Delivery of Infrastructure (Strategic Policy) is expected to have a minor positive effect in relation to SA Objective 5: Design and the Built Environment because through funding, it seeks to ensure that the necessary infrastructure is in place to support high quality development. Large-scale developments will also be required to be supported by an Infrastructure Phasing Plan. A minor positive effect is also expected in relation to SA Objective 3: Economic Growth because providing or contributing towards associated infrastructure requirements at the earliest practical opportunity helps to support the city's economy.

6.407 Minor positive but uncertain effects are expected in relation to SA Objective 1: Climate Change, SA Objective 4: Health, SA Objective 6: Community, SA Objective 7: Services, Facilities and Education, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution and SA Objective 13: Water. This is because the Policy supports infrastructure delivery, which is likely to include structures/facilities that support: healthcare; community facilities; education; open space; green and blue infrastructure; community safety; walking, cycling and public transport; low carbon, decentralised and renewable energy

generation; and water efficiency. The Policy does not specify the different types of infrastructure that will be supported and therefore the effects are recorded as uncertain.

6.408 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.409 Two reasonable alternatives have been considered to Policy IF1: Delivery of Infrastructure (Strategic Policy):

- Reasonable Alternative 1: More flexibility on timescales for delivery – This option could potentially result in the later delivery of infrastructure which is not considered a desirable option.
- Reasonable Alternative 2: More detailed Policy setting out specific infrastructure requirements – This option would provide a very prescriptive Policy which is likely to become out of date quickly.

6.410 Unlike Policy ICF1, Reasonable Alternative 1 does not require development contributions to provide or contribute towards the delivery of infrastructure at the earliest practical opportunity. This has the potential to result in delays to infrastructure delivery. Therefore, this option is likely to have the same effects as Policy IF1, but all are recorded as uncertain. Therefore, minor positive but uncertain effects are expected in relation to SA Objective 1: Climate Change, SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 6: Community, SA Objective 7: Services, Facilities and Education, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

6.411 Reasonable Alternative 2 would outline specific infrastructure requirements and therefore provide more certainty than Policy IF1. Therefore, this option is likely to have the same effects as Policy IC1 but with no uncertainty. Therefore, minor positive effects are expected in relation to SA

Objective 1: Climate Change, SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 6: Community, SA Objective 7: Services, Facilities and Education, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution and SA Objective 13: Water. It is important to note, however, that by specifying all infrastructure requirements this Policy option may quickly become out of date. Negligible effects are expected against the remaining SA objectives.

Policy IF2: Viability (Strategic Policy)

6.412 Policy IF2: Viability (Strategic Policy) sets out the criteria that will apply where development proposals seek to deviate from Policy requirements on the grounds of viability. It does not therefore have many direct links with the SA objectives, although the fact that it seeks to ensure that the Policy requirements throughout the Exeter Plan are enforced means that minor positive effects are likely in relation to many of the SA objectives, particularly the environmental objectives. However, the Policy does also set out how Policy requirements may not be enforced if genuine viability issues are demonstrated. Mixed effects are therefore likely overall.

6.413 There could also be mixed effects in relation to SA Objective 2: Housing and SA Objective 3: Economic Growth because allowing development to deviate from certain Policy requirements where necessary may help to ensure that housing and employment development is still delivered, although it may be less high quality if proposals do not adhere to Policy requirements on the basis of viability concerns.

Reasonable Alternatives

6.414 No reasonable alternatives have been considered in relation to Policy IF2: Viability (Strategic Policy).

Policy IF3: Community Facilities (Strategic Policy)

6.415 Policy IF3: Community Facilities (Strategic Policy) is expected to have significant positive effects in relation to SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education because it protects existing facilities unless it is proven that they are no longer fit for purpose or viable. The Policy also supports the delivery of new or improved facilities, which meet community, social, health, welfare, education, spiritual, cultural, leisure and recreation needs.

6.416 Minor positive effects are expected in relation to SA Objective 8: Sustainable Travel because the Policy requires facilities to be either located within the city centre or at locations which are easily accessible by active travel and public transport. Facilities that serve neighbourhood needs should be located within or close to district or local centres or at locations easily accessible by active travel. This has potential indirect minor positive effects in relation to SA Objective 9: Pollution as it may have potential to help reduce air and noise pollution associated with use of the private car.

6.417 A minor positive effect is expected in relation to SA Objective 2: Housing as protecting community facilities and supporting the provision of new facilities will ensure there is adequate infrastructure to support housing development.

6.418 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.419 One reasonable alternative has been considered in relation to Policy IF3: Community facilities (Strategic Policy):

- Reasonable Alternative 1: More flexibility for conversions to other uses – This could result in the inappropriate loss of valued community facilities.

Although this may potentially boost housing supply, community facilities are an essential part of residents' lives and therefore merit protection, in line with national policy.

6.420 Reasonable Alternative 1 is expected to have a minor positive effect in relation to SA Objective 2: Housing because having more flexibility may encourage the conversion of existing community facilities into residential uses. However, this may result in the loss of valued community facilities. Therefore, minor negative but uncertain effects are expected in relation to SA Objective 4: Health and SA Objective 6: Community. Negligible effects are expected against the remaining SA objectives.

Policy IF4: Open Space, Play Areas, Allotments and Sport

6.421 Policy IF4: Open Space, Play Areas, Allotments and Sport protects sport facilities, playing pitches, play areas, open space, local green spaces and allotments unless they are no longer fit for purpose or viable. The Policy also requires residential development to provide or make contributions to sports facilities, playing pitches, play areas, open space and allotments (including ongoing management and maintenance). This will increase access to open space and sports facilities for recreation supporting healthier lifestyles. Therefore, a significant positive effect is expected against SA Objective 4: Health. The Policy supports open space that is of safe and secure design. New sports facilities, playing pitches, play areas, open space, local green spaces and allotments should be designed to be inclusive and accessible for all, resulting in a minor positive effect for SA Objective 5: Design and Built Environment and a significant positive effect for SA Objective 6: Community.

6.422 A minor positive effect is expected against SA Objective 8: Sustainable Travel as new sports facilities, playing pitches, play areas, open space, local green spaces and allotments are required to be integrated into the local active travel network which could encourage the use of sustainable modes of transport such as walking and cycling.

6.423 A minor positive effect is expected in relation to SA Objective 2: Housing as protecting existing open space, play areas, green spaces, allotments and playing pitches will ensure there is adequate infrastructure to support housing development. In addition, the policy requires residential developments to provide or make contributions to a range of sports facilities, playing pitches, play areas, open space and allotments. This will ensure the delivery of high-quality residential developments. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.424 Four reasonable alternatives have been considered to Policy IF4: Open Space, Play Areas, Allotments and Sport:

- Reasonable Alternative 1: No Policy - This option would not provide sufficient Policy protection against the loss of important open space and recreational facilities nor sufficiently promote the needs of additional provision. This option has not been subject to SA as it is not considered to be reasonable.
- Reasonable Alternative 2: Include separate policies for the various types of open space and recreation facilities – This would provide a more complex and repetitive Policy approach which would not provide significant additional Policy coverage for the plan and therefore would not add value.
- Reasonable Alternative 3: Less restrictive Policy – This would not provide sufficient protection for much needed open space recreational facilities and so is not considered appropriate.
- Reasonable Alternative 4: More restrictive Policy – This could provide an inappropriately inflexible approach which could render unviable and underused facilities without appropriate scope for redevelopment meaning an inefficient use of land.

6.425 As the content of the Policy would remain the same under Reasonable Alternative 2, but it would be divided up into separate policies, the effects are expected to be the same as described above for Policy IF4.

6.426 A less restrictive Policy through Reasonable Alternative 3 could result in a lack of provision of required open space, play areas and sport facilities through little protection for areas of open space and sports facilities. However, there would still be some limited provision to meet need. Therefore, minor positive effects are expected in relation to SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education. The loss of open space could negatively impact active travel routes and reduce the sustainable transport options available. Therefore, minor positive effect is expected in relation to SA Objective 8: Sustainable Travel. Negligible effects are expected against the remaining SA objectives.

6.427 A more restrictive Policy would still provide protection for areas of open space, play areas and sport facilities and therefore not resulting in the loss of these facilities. The Policy would also still lead to the delivery of open space, play areas and sport facilities to meet demand. An oversupply of facilities and areas of open space could provide more variety for residents. Therefore, a significant positive effect is expected against SA Objective 4: Health and SA Objective 6: Community and minor positive effects are expected against SA Objective 5: Design and the Built Environment and SA Objective 8: Sustainable Travel.

Policy IF5: New Cemetery Provision

6.428 Policy IF5: New Cemetery Provision supports proposals for cemetery provision. A minor positive effect is expected in relation to SA Objective 4: Health as the Policy ensures that there will not be a loss of public access, open space and / or recreational areas as a result of cemetery provision.

6.429 Policy IF5: New cemetery provision requires proposals for cemetery provision to be located outside of areas of high flood risk, Groundwater Protection Zones and contaminated land or historic landfill. It also requires proposals not to have an unacceptable impact on landscape sensitivity or biodiversity. Proposals should also not have an unacceptable impact on heritage assets including archaeology. Therefore, minor positive effects are

expected against SA Objective 10: Biodiversity and Geodiversity, SA Objective 9: Pollution, SA Objective 12: Cultural Heritage, SA Objective 11: Landscape and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.430 No reasonable alternatives have been considered to Policy IF5: New cemetery provision.

Site Allocation Policies

6.431 This section presents the appraisals of the following site allocation policies:

- Strategic mixed-use brownfield allocation: SBA1 - Water Lane (Strategic policy)
- Strategic mixed-use brownfield allocation: SBA2 - East Gate (Strategic policy)
- Strategic mixed-use brownfield allocation: SBA3 - Red Cow (Strategic policy)
- Strategic mixed-use brownfield allocation: SBA4 - Exe Bridges Retail Park (Strategic policy)
- Strategic mixed-use brownfield allocation: SBA5 - South Gate (Strategic policy)
- T11: Topsham Infrastructure Delivery Framework: Strategic policy

6.432 The likely effects of the policies in relation to each SA objective are shown in Table 6.15 and described below the table.

6.433 The sites allocated in these policies were originally appraised as site options in Chapter 5. Those ‘Policy off’ appraisals of the relevant site options were used as a starting point and were updated to take into account the specific Policy wording. These are shown in Table 6.14 below.

Table 6.14: Relationship between the Site allocation policies and site options

Site allocation policy	Site Option reference
Strategic mixed-use brownfield allocation: SBA1 - Water Lane (Strategic policy)	Site ID: 15 (Water Lane)
Strategic mixed-use brownfield allocation: SBA2 - East Gate (Strategic policy)	Site ID: 52 (East Gate)
Strategic mixed-use brownfield allocation: SBA3 - Red Cow (Strategic policy)	Site ID: 22 (Red Cow/St Davids)
Strategic mixed-use brownfield allocation: SBA4 - Exe Bridges Retail Park (Strategic policy)	Site ID: 142 (Exe Bridges Retail Park)
Strategic mixed-use brownfield allocation: SBA5 - South Gate (Strategic policy)	Site ID: 46 (South Gate)

Table 6.15: Summary of SA findings for Site Allocation Policies

SA Objectives	SBA1: Water Lane	SBA2: East Gate	SBA3: Red Cow	SBA4: Exe Bridges Retail Park	SBA5: South Gate	T11: Topsham Infrastructure Delivery Framework
SA1: Climate Change	++	++	++	++	++	+?
SA2: Housing	++	++	++	++	++	0
SA3: Economic Growth	+	--?/+	+	+	+	0
SA4: Health	++	++	++	++	++	+
SA5: Design and the Built Environment	++	++	++	++	++	0
SA6: Community	++	++	++	++	++	+
SA7: Services, Facilities and Education	++	++	++	++	++	+
SA8: Sustainable Travel	++	++	++	++	++	+
SA9: Pollution	+/-	--/+	--/+	--/+	+	+?
SA10: Biodiversity and Geodiversity	--/+	+/-	--/+	+/-	+/-	0

Chapter 6 Sustainability Appraisal Findings for the Publication Plan

SA Objectives	SBA1: Water Lane	SBA2: East Gate	SBA3: Red Cow	SBA4: Exe Bridges Retail Park	SBA5: South Gate	T11: Topsham Infrastructure Delivery Framework
SA11: Landscape	-/+	0	0	0	0	+
SA12: Cultural Heritage	--/+	+/-	--/+	+/-	++/--	0
SA13: Water	--/+	+	--/+	+	+	0
SA14: Resources	++	++	++	++	++	0

6.434 Policies SBA1, SBA2, SBA3, SBA4 and SBA5 perform similarly in relation to a number of the SA objectives and these effects are summarised below. The specific effects of the individual Site Allocation Policies are then described below.

6.435 Significant positive effects are identified for Policies SBA1, SBA2, SBA3, SBA4 and SBA5 in relation to SA Objective 1: Climate Change. Each of these policies includes the requirements of an Energy Strategy that minimises carbon emissions (operational and embodied), incorporates renewable and low carbon energy generation and helps deliver and connect to local energy networks. Development must support the achievement of net-zero. Each Policy includes adaptation measures including appropriate flood risk mitigations, SuDS and enhancement of green infrastructure.

6.436 Significant positive effects are identified for Policies SBA1, SBA2, SBA3, SBA4 and SBA5 in relation to SA Objective 2: Housing. These policies set out the requirement for the delivery of homes up to 2040. Each Policy sets out the requirements for the delivery of a wide range of housing, including affordable homes, custom and self-build plots, accessible and adaptable homes, and a range of sizes that take account of local need. At South Gate, appropriate accommodation for rough-sleepers will be provided either on-site or off-site. Overall, it is considered that the Site Allocation Policies will help address local housing demands including helping address to needs of more specialist groups.

6.437 A significant positive effect is also identified for Policies SBA1, SBA2, SBA3, SBA4 and SBA5 for SA Objective 5: Design and the Built Environment. These Policies require accordance with the Liveable Exeter Principles to “deliver a compact and well-connected neighbourhood, incorporating the highest standards of design”. The Policy for Water Lane also requires accordance with the ‘Liveable Water Lane Supplementary Planning Document’.

6.438 Significant positive effects are also identified for policies SBA1, SBA2, SBA3, SBA4 and SBA5 with regard to SA Objective 8: Sustainable Travel. Each of these sites are located in close proximity of Exeter city centre and are well served by existing public transport connections. Additionally, each of these

Site Allocation Policies require the incorporation of active design principles including active travel routes, contributions to off-site active travel routes, provisions for/contributions to public transport, electric vehicle charging points and mobility hubs.

6.439 Significant positive effects are identified for policies SBA1, SBA2, SBA3, SBA4 and SBA5 against SA Objective 14: Resources. Each of these sites represents the re-development of brownfield land. Each Site Allocation Policy requires an energy strategy that minimises carbon emissions (both operational and embodied) and Policy SBA1 requires measures to support the continued operation of existing waste operations close to the site. The scale of demolition and new development to be delivered at each site is likely to result in considerable use of resources. Each of these policies also requires investigation and appropriate mitigation and remediation of any contaminated land, to ensure that the land is, or can be made suitable for, the proposed use.

Strategic mixed-use brownfield allocation: SBA1 - Water Lane (Strategic Policy)

6.440 For this Policy, a minor positive effect is expected against SA Objective 3: Economic Growth. The Policy supports the retention of existing employment space within the site while proposing new employment provision to meet the needs of the transformational sectors including work hubs, collaborative workspace and live-work schemes, together with maritime sectors.

6.441 An overall significant positive effect is identified for SA Objective 4: Health. The site contains existing areas of open space which may be lost to development. However, the Policy sets out the requirement for green infrastructure provision including off-site contributions, a new community green space, a mix of open space provision for sport and recreation, high quality links with the Exeter Ship Canal and Riverside Valley Park, as well as new medical facilities such as a new surgery providing GP, pharmacy and other community healthcare, or contributions to provision. It also aids in requiring the protection and enhancement of existing sports facilities.

6.442 Significant positive effects are identified for SA Objective 6: Community Cohesion and SA Objective 7: Services, Facilities and Education. The Policy requires a locally accessible neighbourhood centre including a public realm that includes a community green space and provides space for community and cultural activities, health facilities, retail and commercial units, employment space and primary education. The Policy also requires space for water-related activities, as well as ensuring protection of existing community and sports facilities. The Policy also requires transport infrastructure to have a layout and design that takes account of the needs of people with disabilities. This will ensure development is well linked to services and facilities and will contribute to improved access to educational facilities. Ensuring a well-designed neighbourhood will help deliver a cohesive neighbourhood and encourage higher levels of pedestrian/outdoor interaction for informal interaction between residents.

6.443 A mixed effect (minor negative and minor positive) is expected in relation to SA Objective 9: Pollution. The site is located in close proximity to Exeter city centre with good public transport links which could reduce reliance on the private car. The Policy also proposes measures to enhance active travel and public transport routes and to minimise car parking provision, with a site-wide strategy that allows for levels of car parking to reduce further over time. There will also be provision for electric vehicle charging points. However, given the scale of development proposed through this site allocation there will likely see some increase in traffic movements which could negatively impact air quality and increase pollution.

6.444 Development of the site will result in the loss of green infrastructure. However, the Policy requires the provision of new green infrastructure including off-site provision and biodiversity enhancements along with high quality green infrastructure linking to the Exeter Ship Canal and Riverside Valley Park, as well as mitigation of impacts on priority habitats. The Policy will also ensure no adverse effect on European sites with mitigation contributions required in line with the South-east Devon Joint Habitat Mitigation Strategy and mitigation impacts on priority habitats. Therefore, a mixed effect (significant negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.445 The site allocation includes an area considered to have high or medium to high landscape sensitivity. However, these areas are the Canal where development is not proposed. The Policy does support the creation of high quality green infrastructure linking to the Exeter Ship Canal and Riverside Valley Park. Improvements are also proposed to a small recreational area (Bronhams Farm) which is currently a small car park and recreational changing room. Therefore, a mixed effect (minor negative and minor positive) is expected in relation to SA Objective 11: Landscape.

6.446 A small portion of the north eastern edge of the site allocation falls within the Riverside Conservation Area. There are also a number of Listed Buildings that lie within close proximity to the site allocation. The Policy does propose to enhance the character and appearance of the Riverside Conservation Area and protect the setting of all Listed Buildings. The Policy will also enhance the Canal with key buildings to be retained and re-used. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 12: Cultural Heritage.

6.447 The site allocation is located entirely within Flood Zone 2 or Flood Zone 3 on the edge of the River Exe. However, the majority of site is previously developed and flood defences are in place. The Policy requires appropriate flood mitigation including a layout and design informed by detailed FRA, incorporation of SuDS and delivery of/contributions to an emergency access and egress route. While the Policy promotes SuDS and other flood resilient design, there is potential for adverse effects on the water environment and related to flood risk from construction and higher density development. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 13: Water.

Strategic mixed-use brownfield allocation: SBA2 - East Gate (Strategic Policy)

6.448 For this Policy, an overall mixed effect (uncertain significant negative/minor positive) is identified for SA Objective 3: Economic Growth. The

site allocation will result in the loss of existing employment sites within the city. However, the Policy includes provision for a mix of employment provision which includes office space, work hubs, collaborative workspace and live-work schemes.

6.449 A significant positive effect is expected in relation to SA Objective 4: Health. However, the Policy requires contributions to GP provision and the development of public realm which provides space for communities and cultural activities. The Policy also requires the provision of a mobility hub and space for education and an innovation hub to support the development. Green infrastructure provision is also required in accordance with the Green Infrastructure Strategy.

6.450 According to the IMD, the site allocation falls within the 20-30% most deprived areas. The Policy requires any development to accord with the Liveable Exeter Principles delivering a compact and well-connected neighbourhood. The Policy also requires retail or commercial units; public realm; space for education and an innovation hub; contributions to education including special educational needs education and green infrastructure provision. The Policy also requires transport infrastructure to have a layout and design that takes account of the needs of people with disabilities. This will ensure development is well linked to services and facilities and will contribute to improved access to educational facilities. Ensuring a well-designed neighbourhood will help deliver a cohesive neighbourhood and encourage higher levels of pedestrian/outdoor interaction for informal interaction between residents. Therefore, significant positive effects are identified for SA Objective 6: Community Cohesion and SA Objective 7: Services, Facilities and Education.

6.451 Part of the AQMA along B1383 falls within the southern portion of the site allocation. Therefore, any development within this area has the potential to exacerbate air pollution issues within the area. However, as the site allocation is located in close proximity to Exeter city centre with good public transport links, reliance on the private car is not likely to be significant. Policy SBA2 also proposes measures to enhance active travel and public transport routes. There will also be provision for electric vehicle charging points. However, given the scale of development proposed through this site allocation it will likely see some

increase in traffic movements which could negatively impact air quality and increase pollution. Therefore, a mixed effect (significant negative and minor positive) is expected in relation to SA Objective 9: Pollution.

6.452 The site allocation is located approximately 870m from the Bonhay Road Cutting SSSI. The Policy requires the provision of new green infrastructure including off-site provision and biodiversity enhancements. The Policy will also ensure no adverse effect on European sites with mitigation contributions required in line with the South-east Devon Joint Habitat Mitigation Strategy. Therefore, a mixed effect (minor negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and geodiversity.

6.453 The site allocation is not located within an area assessed as having medium or high landscape sensitivity. Therefore, a negligible effect is expected in relation to SA Objective 11: Landscape.

6.454 The site allocation does not contain any designated heritage assets and/or fall within a conservation area. There are two Listed Buildings and a number of conservation areas within close proximity to the site allocation which have the potential to be impacted by development of the site allocation. However, the Policy requires enhancement to the character and appearance of the Southernhay and The Friars and the Lower Summerlands Conservation Areas and protection to the settings of all listed buildings including the cathedral (Grade II), Sidwell Street Methodist Church (Grade II* listed), 13-15 Dix's Field (Grade II*) and those along Heavitree Road and Dix's Field and Southernhay Congregational Church (Grade II). Therefore, mixed effects (minor negative and minor positive) are identified against SA Objective 12: Cultural Heritage.

6.455 The site allocation is not located within an area with 1 in 30 year or 1 in 100 year risk of surface water flooding. The Policy requires appropriate flood mitigation including a layout and design informed by detailed flood risk assessment and incorporation of SuDS. While the Policy promotes SuDS and other flood resilient design, there is potential for adverse effects on the water environment and related to flood risk from construction and higher density

development. Therefore, a minor positive effect is expected in relation to SA Objective 13: Water.

Strategic mixed-use brownfield allocation: SBA3 - Red Cow (Strategic Policy)

6.456 For this Policy, a minor positive effect is expected in relation to SA Objective 3: Economic Growth as the site allocation will retain existing levels of employment floor space and include new forms of employment provision to meet the needs of the transformational sectors which includes work hubs, collaborative workspace and live-work schemes.

6.457 A significant positive effect is identified for SA Objective 4: Health as the Policy requires contributions to GP provision and also lies within 600m of a healthcare facility. The Policy also requires the enhancement of green infrastructure including off-site contributions, public realm improvements, and biodiversity enhancements.

6.458 The Policy requires any development to accord with the Liveable Exeter Principles delivering a compact and well-connected neighbourhood. The Policy also requires retail or commercial units; public realm; contributions to education including special educational needs education and green infrastructure provision. This will ensure development is well linked to services and facilities and will contribute to improved access to educational facilities. Ensuring a well-designed neighbourhood will help deliver a cohesive neighbourhood and encourage higher levels of pedestrian/outdoor interaction for informal interaction between residents and transport layout and design to take account of the needs of people with disabilities. Therefore, significant positive effects are identified for SA Objective 6: Community Cohesion and SA Objective 7: Services, Facilities and Education.

6.459 Part of the AQMA along Bonhay Road falls within the site allocation. Therefore, any development within this area has the potential to exacerbate air

pollution issues within the area. However, as the site allocation is located in close proximity to Exeter city centre with good public transport links, reliance on the private car is not likely to be significant. The Policy also proposes measures to enhance active travel and public transport routes. There will also be provision for electric vehicle charging points. However, given the scale of development proposed through this site allocation it will likely see some increase in traffic movements which could negatively impact air quality and increase pollution. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 9: Pollution.

6.460 Development of the site allocation through Policy SBA3 will result in the loss of green infrastructure. The site allocation is located approximately 440m from the Bonhay Road Cutting SSSI. However, the Policy requires the provision of new green infrastructure including off-site provision and biodiversity enhancements. The Policy will also ensure no adverse effect on European Sites with mitigation contributions required in line with the South-east Devon Joint Habitat Mitigation Strategy. Therefore, a mixed effect (significant negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and geodiversity.

6.461 The site allocation is not located within an area assessed as having medium or high landscape sensitivity. Therefore, a negligible effect is expected in relation to SA Objective 11: Landscape.

6.462 A small part of the St David's Conservation Area lies within the centre of the site allocation which could be impacted by development. However, Policy SBA3 proposes to enhance the character and appearance of St David's Conservation Area and retain sight lines of locally listed St David's station. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 12: Cultural Heritage.

6.463 The site allocation is located entirely within Flood Zone 2 or Flood Zone 3 on the edge of the River Exe. The site has been previously developed and flood defences are in place. Policy SBA3 requires appropriate flood mitigation including a layout and design informed by detailed FRA, incorporation of SuDS

and makes provision for emergency access and egress. While the Policy promotes SuDS and other flood resilient design, there is potential for adverse effects on the water environment and related to flood risk from construction and higher density development. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 13: Water.

Strategic mixed-use brownfield allocation: SBA4 - Exe Bridges Retail Park (Strategic Policy)

6.464 An uncertain minor positive effect is expected in relation to SA Objective 3: Economic Growth as the site allocation will include retail space which could provide new forms of employment provision. The Policy also supports employment provision in the form of collaborative workspace.

6.465 A significant positive effect is identified for SA Objective 4: Health as the Policy requires contributions to GP provision and also lies within 600m of a healthcare facility. The Policy also requires the enhancement of green infrastructure including off-site contributions, public realm improvements, and biodiversity enhancements.

6.466 The Policy requires any development to accord with the Liveable Exeter Principles, delivering a compact and well-connected neighbourhood. The Policy also requires retail or commercial units; public realm; contributions to education including special educational needs education and green infrastructure provision. This will ensure development is well linked to services and facilities and will contribute to improved access to educational facilities. Ensuring a well-designed neighbourhood will help deliver a cohesive neighbourhood and encourage higher levels of pedestrian/outdoor interaction for informal interaction between residents. Therefore, significant positive effects are identified for SA Objective 6: Community Cohesion and SA Objective 7: Services, Facilities and Education.

6.467 Part of the AQMA along Cowick Street and Alphington Street borders the site allocation. Therefore, any development within this area has the potential to exacerbate air pollution issues within the area and new residents could be affected by existing air quality issues. However, as the site allocation is located in close proximity to Exeter city centre with good public transport links, reliance on the private car is not likely to be significant. The Policy also proposes measures to enhance active travel and public transport routes and there will be provision for electric vehicle charging points. However, given the scale of development proposed through this site allocation it will likely see some increase in traffic movements which could negatively impact air quality and increase pollution. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 9: Pollution.

6.468 The site allocation is located approximately 550m from the Bonhay Road Cutting SSSI which could be impacted by development. However, the Policy requires the provision of new green infrastructure including off-site provision and biodiversity enhancements. The Policy will also ensure no adverse effect on European sites with mitigation contributions required in line with the Southeast Devon Joint Habitat Mitigation Strategy. Therefore, a mixed effect (minor negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and geodiversity.

6.469 The site allocation is not located within an area assessed as having medium or high landscape sensitivity. Therefore, a negligible effect is expected in relation to SA Objective 11: Landscape.

6.470 The site allocation was rated yellow in the Heritage Impact Assessment, indicating that development has the potential to cause less than substantial harm to the significance of a heritage asset(s). Therefore, some negative effects on the historic environment could occur as a result of development of the site. However, Policy SBA4 requires a layout and built form informed by Exeter Views, Density and Heights Study and archaeological and heritage assessment. The development is also required to enhance the character and appearance of Cowick Street and Riverside Conservation Areas and protect the setting of all listed buildings including St Thomas Railway Station (Grade II) and the Old Exe

Bridge Scheduled Monument. Therefore, mixed effects (minor negative and minor positive) are expected in relation to SA Objective 12: Cultural Heritage.

6.471 The site allocation is not located within an area at risk of flooding or surface water flooding. Policy SBA4 requires appropriate flood mitigation including a layout informed by detailed FRA, incorporation of SuDS and makes provision for emergency access and egress. Therefore, a minor positive effect is expected in relation to SA Objective 13: Water.

Strategic mixed-use brownfield allocation: SBA5 - South Gate (Strategic Policy)

6.472 A minor positive effect is expected in relation to SA Objective 3: Economic growth as the site allocation will include new forms of employment provision to meet the needs of the transformational sectors which includes work hubs, collaborative workspace and live-work schemes.

6.473 A significant positive effect is identified for SA Objective 4: Health. The Policy sets out the requirement for green infrastructure provision and requires contributions to GP provision, with two existing healthcare facilities also located within 700m of the site allocation.

6.474 According to the IMD, the site allocation falls within the 20-30% most deprived areas. The Policy requires any development to accord with the Liveable Exeter Principles delivering a compact and well-connected neighbourhood. The Policy also requires retail or commercial units; public realm; contributions to education including special educational needs education and green infrastructure provision. The Policy also requires transport infrastructure to have a layout and design that takes account of the needs of people with disabilities. This will ensure development is well linked to services and facilities and will contribute to improved access to educational facilities. Ensuring a well-designed neighbourhood will help deliver a cohesive neighbourhood and encourage higher levels of pedestrian/outdoor interaction

for informal interaction between residents. Therefore, significant positive effects are identified for SA Objective 6: Community Cohesion and SA Objective 7: Services, Facilities and Education.

6.475 A road intersection of four main streets covered by an AQMA falls within the site allocation. Therefore, any development within this area has the potential to exacerbate air pollution issues within the area. However, as the site allocation is located in close proximity to Exeter city centre with good public transport links, reliance on the private car is not likely to be significant. The Policy also proposes measures to enhance active travel and public transport routes. There will also be provision for electric vehicle charging points. In addition, the policy will ensure a car free development. Therefore, minor positive effect are expected in relation to SA Objective 9: Pollution.

6.476 The site allocation is located approximately 655m from the Bonhay Road Cutting SSSI. However, the Policy requires the provision of new green infrastructure including off-site provision and biodiversity enhancements. The Policy will also ensure no adverse effect on European Sites with mitigation contributions required in line with the South-east Devon Joint Habitat Mitigation Strategy. Therefore, mixed effects (minor negative and minor positive) are expected in relation to SA Objective 10: Biodiversity and geodiversity.

6.477 The site allocation is not allocated within an area assessed as having medium or high landscape sensitivity. Therefore, a negligible effect is expected in relation to SA Objective 11: Landscape.

6.478 The site allocation falls within the City Centre and the Southernhay and The Friars Conservation Area and within an area of archaeological importance. The site allocation also contains a number of Listed Buildings which include multiple churches and properties along North Street. However, the Policy requires the enhancement of Southernhay and The Friars and the Central Conservation Areas and protects the settings of the City Walls and all listed buildings including the Cathedral (Grade I listed) George's Chapel (Grade I listed), Wynard's Hospital (Grade II* listed), the Hotel Du Vin (Grade II listed), the Gateway to Palmer's Almshouses (Grade II listed), 45, 46, 49, 50 and 63 to

66 Magdalen Street (Grade II listed), The White Ensign Club (Grade II listed), 71 to 75 Holloway Street (Grade II listed) and others in surrounding streets. Contributions towards the repair, maintenance and enhancement of the Exeter City Walls will be required where appropriate. Therefore, mixed effects (significant negative and significant positive) are expected in relation to SA Objective 12: Cultural Heritage.

6.479 A minor positive effect is identified for the Policy in relation to SA Objective 13: Water. The site is not located within an area of 1 in 30 year or 1 in 100 year risk of surface water flooding. The Policy requires appropriate flood mitigation including a layout and design informed by detailed flood risk assessment and incorporation of SuDS. The Policy also requires mitigation to ensure no adverse effects on European Sites, located downstream. While the Policy promotes SuDS and other flood resilient design, there is potential for adverse effects on the water environment and related to flood risk from construction and higher density development.

TI1: Topsham Infrastructure Delivery Framework: (Strategic Policy)

6.480 Policy TI1 supports the preparation of an Infrastructure Delivery Framework to address development and infrastructure issues on the edge of Topsham and the draft allocation, development next to the M5 and north of Topsham in East Devon. The Infrastructure Delivery Framework will include the delivery and funding of a primary education, healthcare, indoor space for community use, sport and recreation and green infrastructure. This will help to meet the needs of these services and facilities while offering further places for recreation and community use supporting physical activity and social interaction. Therefore, minor positive effects are expected in relation to SA Objective 4: Health, SA Objective 6: Community and SA Objective 7: Services, Facilities and Education.

6.481 The Infrastructure Delivery Framework will also include a comprehensive Transport Strategy which will prioritise active travel and public transport. This

could support the development of and enhancements to public transport links and active travel networks in Topsham. Therefore, a minor positive effect is expected in relation to SA Objective 8: Sustainable Travel. The development of a Transport Strategy that prioritises sustainable transport options could support a reduction in private car use and associated emissions by aiming to prioritise active travel and public transport. This could have a positive effect on minimising contributions to climate change and improving air quality. Therefore, minor positive but uncertain effects are expected in relation to SA Objective 1: Climate Change and SA Objective 9: Pollution.

6.482 A minor positive effect is expected in relation to SA Objective 11: Landscape as the Infrastructure Delivery Framework will need to respect Exeter's landscape setting area and the Clyst Valley regional Park. Negligible effects are expected in relation to all other SA Objectives.

Cumulative Effects

6.483 This section presents an assessment of the likely cumulative, secondary and synergistic effects of the Publication Plan as a whole, against each of the 14 SA objectives.

6.484 Table 6.16 below presents a summary of the likely effects of the objectives and policies in the Publication Plan.

Table 6.16: Summary of SA findings for the Objectives, Policies and Site Allocations in the Publication Plan

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
Objective 1: Climate change	++	0	+	0	0	0	0	0	0	0	0	0	0	0
Objective 2: Homes	0	++	0	0	+?	+?	0	0	0	0	0	0	0	0
Objective 3: Economy and jobs	0	0	++	0	0	0	+	0	0	0	0	0	0	0
Objective 4: The future of our centres	0	0	++	0	0	++	++	+	+	0	0	0	0	0
Objective 5: Sustainable transport and communications	+	0	+	+	0	+	+	++	+	0	0	0	0	0
Objective 6: Natural environment	0	0	0	0	0	0	0	0	0	++	+	0	+	0
Objective 7: History and heritage	0	0	0	0	+	0	0	0	0	0	+	++	0	0
Objective 8: Culture and tourism	0	0	++	+	0	0	0	0	0	0	0	++	0	0
Objective 9: High quality places and design	+	0	0	+	++	++	0	+	+	0	0	0	0	0
Objective 10: Health and wellbeing	0	0	0	0	0	0	0	+	+	0	0	0	0	0
Objective 11: Infrastructure and facilities	+	0	+	+	0	++	++	+?	+?	0	0	0	+?	0
Policy S1: Spatial Strategy (Strategic policy)	+/-?	++	++	+	+?	+	+	++	+/-?	+/-?	+/-?	+/-?	-?	+/-?
Policy S2: Liveable Exeter Principles (Strategic policy)	+?	+?	+?	++	++	++	+?	+?	+?	+/-?	+/-?	+/-?	+/-?	+/-?
Policy CC1: Net zero Exeter (Strategic policy)	++	+	+	+	+	0	+?	+	+	+	+	+?	+	0

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
Policy CC2: Renewable and Low Carbon Energy (Strategic policy)	++	0	+	+	+	+	0	0	+	+	+	+	0	0
Policy CC3: Local Energy Networks (Strategic policy)	++	+	+	0	0	0	0	0	0	0	0	0	0	0
Policy CC4: Ground-mounted photovoltaic arrays	++	+	+	+	0	0	0	0	+	0	0	0	0	++
Policy CC5: Future Development Standards (Strategic policy)	++	+	+	0	0	0	0	0	+	0	0	0	0	0
Policy CC6: Embodied Carbon	++	+	+	0	0	0	0	0	+	0	0	0	0	0
Policy CC7: Development that is adaptive and resilient to Climate Change	++	0	0	0	0	0	0	0	+	+	0	0	+	0
Policy CC8: Flood Risk (Strategic policy)	+	0	0	+	0	0	0	0	0	0	0	0	++	0
Policy CC9: Water quantity and quality	+	-	0	0	0	0	0	0	+	++	0	0	++	++
Policy H1: Housing Requirement (Strategic policy)	0	++	+	0	0	0	0	0	0	-?	-?	-?	-?	-?
Policy H2: Housing Allocations and Windfalls (Strategic policy)	0	++	--?/+	++/--?	0	+	+?/-?	++	--	-- ?	-/0	-?	--	++/--
Policy H3: Regeneration Opportunity Areas (Strategic policy)	0	+	+	+	+	+	0	0	0	0	0	0	0	++
Policy H4: Affordable Housing (Strategic policy)	0	++	0	+	+	+	0	0	0	0	0	0	0	+
Policy H5: Build to Rent	0	++	0	+	++	+	0	0	0	0	0	0	0	0
Policy H6: Co-living Housing	+	++	0	+	++	++	+	+	+	0	0	0	0	0

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economi c Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Educatio n	SA8: Sustaina ble Travel	SA9: Pollution	SA10: Biodivers ity and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
Policy H7: Custom and Self-build Housing	0	++	0	0	+	0	0	0	0	0	+	+	0	0
Policy H8: Homes for Older People	+	++	0	+	+	+	+	+	+	0	0	0	0	0
Policy H9: Supported Housing	+	++	0	++	+	++	++	+	+	0	0	0	0	0
Policy H10: Purpose Built Student accommodation	+	+	0	+	+	+	++	+	+	0	0	0	0	0
Policy H11: Gypsy and Traveller Accommodation	+	++	0	+	+	+	++	+	+	+/0	+/0	0	+	0
Policy H12: Residential conversions and Houses in Multiple Occupation	0	+	0	+	+	+	0	+	0	0	+	+	0	0
Policy H13: Loss of Residential Accommodation	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy H14: Accessible Homes	0	++	0	++	0	++	0	0	0	0	0	0	0	0
Policy H15: Housing Density and Size Mix (Strategic policy)	0	+	+	+	0	+	0	0	0	0	+	+	0	+
Policy H16: Residential Amenity and Healthy Homes	0	++	0	++	+	+	0	0	+	0	0	0	0	0
Policy EJ1: Economic Growth (Strategic policy)	0	0	++	0	0	0	+	0	0	0	0	0	0	0
Policy EJ2: Retention of Employment Land (Strategic policy)	0	0	++	0	0	0	0	0	+	0	0	0	0	++
Policy EJ3: New forms of Employment Provision (Strategic policy)	0	0	++	0	0	0	0	+	+	0	0	0	0	0
Policy EJ4: Access to Jobs and Skills	0	0	++	+	0	0	+	0	0	0	0	0	0	0

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
Policy EJ5: Provision of local services in Employment Areas	0	0	+	+	0	0	+	+	0	0	0	0	0	0
Policy EJ6: New Transformational Employment Allocations (Strategic policy)	0	0	++	++	0	0	+/-	++	0	0	0	0/--	0	++/--
Policy RFC1: The Future of our Centres (Strategic policy)	+	0	++	+	+	+	++	+	+	+	+	+	0	+
Policy RFC2: Development in, and affecting, our Centres (Strategic policy)	+	0	+	+	+	+	++	+	+	+	+	+	0	+
Policy STC1: Sustainable Movement (Strategic policy)	++	0	+	+	0	+	+	++	+	0	0	0	0	0
Policy STC2: The Transport Hierarchy (Strategic policy)	++	0	+	+	0	+	0	++	+	+	0	0	0	0
Policy STC3: Supporting Active Travel (Strategic policy)	++	0	+	+	+	+	+	++	+	+	0	0	0	0
Policy STC4: Supporting Public Transport (Strategic policy)	++	0	0	+	+	0	0	++	+	0	0	0	0	0
Policy STC5: Supporting more Sustainable forms of Car Use	++	0	0	++	+	+	+	++	++	0	0	0	0	0
Policy STC6: Travel Plans	++	0	0	++	0	0	+	++	++	0	0	0	0	0
Policy STC7: Safeguarding Transport Infrastructure (Strategic policy)	++	0	0	++	0	+	+	++	++	-	0	0	+	0
Policy STC8: Motorway Service Area (Strategic policy)	-	0	++	+/-	0	0	-	+/-	+/-	0	0	0	0	0
Policy STC9: Digital Communications (Strategic policy)	++	0	0	0	0	0	0	+	+	0	0	0	0	0

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economi c Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Educatio n	SA8: Sustaina ble Travel	SA9: Pollution	SA10: Biodivers ity and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
Policy NE1: Landscape Setting Areas (Strategic policy)	+	-?	0	0	0	0	0	0	0	+	++	0	+	0
Policy NE2: Valley Parks (Strategic policy)	+	-?	0	+	0	0	0	+	+	++	+	0	+	0
Policy NE3: Biodiversity (Strategic Policy)	+	-?	0	+	0	0	0	0	0	++	0	0	0	0
Policy NE4: Green Infrastructure (Strategic policy)	+	0	0	+	0	0	0	+	+	++	+	0	0	0
Policy NE5: Green Circle	0	0	0	++	0	++	0	+	0	0	0	0	0	0
Policy NE6: Urban Greening Factor	+	0	0	+	+	0	0	0	+	++	+	0	+	0
Policy NE7: Urban Tree Canopy cover	+	0	0	+	+	0	0	0	+	+?	+	0	+	0
Policy HH1: Conserving and enhancing Heritage Assets (Strategic policy)	+	0	0	0	+	0	0	0	0	0	0	++	0	0
Policy HH2: Conservation Areas	0	0	0	0	+	0	0	0	0	0	0	++	0	0
Policy HH3: Archaeology	0	0	0	0	0	0	0	0	0	0	0	++	0	0
Policy HH4: Heritage assets and Climate Change	+	0	0	0	+	0	0	0	0	0	0	++/-	0	0
Policy HH5: Conserving and enhancing Exeter City Walls	0	0	0	+	0	0	0	0	0	0	0	++	0	0
Policy C1: Protecting and enhancing Cultural and Tourism Facilities (Strategic policy)	0	0	++	+	0	0	0	0	0	0	0	+	0	0
Policy C2: Development and Cultural Provision (Strategic policy)	0	0	0	0	0	+	0	0	0	0	0	+	0	0

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
Policy D1: Design principles (Strategic policy)	+	0	+	+	++	+	0	+	+	+	+	+	0	+
Policy D2: Designing-out crime	0	0	0	+	+	++	0	0	0	0	0	0	0	0
Policy D3: Advertisements	+	0	0	0	+	+	0	0	+	0	+	+	0	0
Policy HW1: Health and Wellbeing (Strategic policy)	0	0	0	++	0	++	+	+	+	0	0	0	0	0
Policy HW2: Environmental quality, pollution and contaminated land	+	0	+	+	0	0	+	0	++	0	0	0	0	+
Policy IF1: Delivery of Infrastructure (Strategic policy)	+	0	+	+	+	+	+	+	+	0	0	0	+	0
Policy IF2: Viability (Strategic policy)	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
Policy IF3: Community Facilities (Strategic policy)	0	+	0	++	0	++	++	+	+	0	0	0	0	0
Policy IF4: Open Space, Play Areas, Allotments and Sport	0	+	0	++	+	++	0	+	0	0	0	0	0	0
Policy IF5: New Cemetery Provision	0	0	0	+	0	0	0	0	+	+	+	+	+	0
Strategic mixed-use brownfield allocation: SBA1 - Water Lane (Strategic policy)	++	++	+	++	++	++	++	++	+/-	--/+	-/+	--/+	--/+	++
Strategic mixed-use brownfield allocation: SBA2 - East Gate (Strategic policy)	++	++	--?/+	++	++	++	++	++	--/+	+/-	0	+/-	+	++
Strategic mixed-use brownfield allocation: SBA3 - Red Cow (Strategic policy)	++	++	+	++	++	++	++	++	--/+	--/+	0	--/+	--/+	++
Strategic mixed-use brownfield allocation: SBA4 - Exe Bridges Retail Park (Strategic policy)	++	++	+	++	++	++	++	++	--/+	+/-	0	+/-	+	++

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economi c Growth	SA4: Health	SA5: Design and the Built Environm ent	SA6: Communi ty	SA7: Services, Facilities and Educatio n	SA8: Sustaina ble Travel	SA9: Pollution	SA10: Biodivers ity and Geodiver sity	SA11: Landscap e	SA12: Cultural Heritage	SA13: Water	SA14: Resource s
Strategic mixed-use brownfield allocation: SBA5 - South Gate (Strategic policy)	++	++	+	++	++	++	++	++	+	+/-	0	++/--	+	++
TI1: Topsham Infrastructure Delivery Framework: Strategic policy	+	0	0	+	0	+	+	+	+	0	+	0	0	0

SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change

6.485 The Publication Plan includes a number of ambitious and aspirational policies seeking to mitigate and adapt to climate change, particularly in the 'Climate Emergency' section. Policy CC1: Net Zero Exeter (Strategic Policy) requires development proposals to achieve net zero through various measures, including careful consideration of the location and form of development, a fabric first approach, applying the principles of the circular economy, green infrastructure provision, renewable and low carbon energy generation, minimising operational and embodied carbon, minimising the need to travel and encouraging walking, cycling and the use of public transport. Local energy networks are key to achieving net zero and are proposed under Policy CC3: Local Energy Networks (Strategic Policy), and there is a Policy dedicated to mitigating flood risk and utilising SuDS (Policy CC8: Flood Risk (Strategic Policy)). The use of PV panels is supported through Policy CC4: Ground-mounted photovoltaic array. Policy CC7 will ensure that development is adaptive and resilient to climate change. Policy CC5: Future Development Standards requires development to achieve a reduction in carbon dioxide emissions in line with the 2013 Building Regulations.

6.486 All of the sites allocated in the Publication Plan via Policy H2: Housing allocations (Strategic Policy) and windfalls, both residential and mixed-use, are considered to have negligible effects on this SA objective as the effects of new development will depend largely on the detailed design proposals for each site, rather than by the location of sites. However, the overall scale of development proposed under Policy H1: Housing Requirements (Strategic Policy) will inevitably result in increased carbon emissions from buildings, commercial activities and road traffic, despite the strong mitigation built into the Plan.

6.487 Overall, the Publication Plan is expected to have a cumulative mixed significant positive and minor negative effect (++/-) on SA Objective 1: Climate Change.

SA Objective 2: To provide a suitable supply of high quality housing including an appropriate mix of types and tenures

6.488 The Exeter Plan will deliver a total of 13,975 new homes over the Plan period, as detailed in Policy H1: Housing Requirement (Strategic Policy). Policy H2: Housing allocations and windfalls (Strategic Policy) allocates 38 sites with the capacity for 5,369 new homes, 33 of which are residential sites and five of which are mixed-use and will therefore incorporate housing development alongside other uses. Policy H2 is expected to have a significant positive effect in relation to this objective because the sites it allocates will contribute significantly to housing supply within the city. In addition, a number of Policies (Policy H4: Affordable Housing, Policy H5: Build to Rent, Policy H6: Co-living, Policy H7: Custom and Self-building Housing, Policy H8: Homes for Older people and Policy H10: Purpose Built Student Accommodation) within the Exeter Plan support the delivery of a variety of types of housing including affordable housing and housing for different needs.

6.489 The provision of Gypsy and Traveller accommodation is supported through Policy H11: Gypsy and Traveller Accommodation.

6.490 Overall, the Publication Plan is expected to have a cumulative significant positive effect (++) on SA Objective 2: Housing.

SA Objective 3: To support the sustainable and diverse growth of the City's economy and maximise employment opportunities

6.491 The Publication Plan supports employment development specifically for the transformational sectors, which includes data analytics, environmental futures, health innovation and digital innovation, through Policy EJ1: Economic Growth (Strategic Policy). The remaining policies in the 'Economy and Jobs' section of the Publication Plan outline the ways in which the City Council will support economic growth, namely through the retention of existing employment land (Policy EJ2: Retention of Employment Land (Strategic Policy)) and support for flexible working (Policy EJ3: New Forms of Employment Provision (Strategic Policy)), in addition to removing barriers to employment for local residents and facilitating skills development and learning opportunities (e.g. through employment initiatives) via Policy EJ4: Access to Jobs and Skills. Policy EJ6: New transformational employment allocations (Strategic Policy) allocates a total of 16.6ha of transformational employment land across four sites.

6.492 Policy RFC1: The Future of our Centres (Strategic Policy) and Policy RFC2: Development in, and affecting, our Centres (Strategic Policy) in 'Retail and the Future of our Centres' section of the Plan will also have positive effects on SA Objective 3: Economic Growth, as diversifying the offer of the city centre along its high streets and directing growth to Exeter's centres will have beneficial effects on the economy. Likewise, Policy C1: Protecting and Enhancing Cultural and Tourism Facilities (Strategic Policy) in the 'Culture and tourism' section of the Plan recognises the importance of cultural and tourism industries to the success of the city. The 'Sustainable Transport and Communications' section of the Plan also contains policies that will have broadly positive effects on this objective, particularly Policies STC1: Sustainable movement (Strategic Policy); STC2: The Transport Hierarchy (Strategic Policy); and STC3: Supporting Active Travel (Strategic Policy) as they encourage the use of enhancement of sustainable modes of transport which will support a low carbon economy. In addition, Policy STC8: Motorway Service Area (Strategic

Policy) supports the redevelopment of the motorway service area adjacent to Junction 30 on the M5, for employment uses.

6.493 Policy H2: Housing allocations and Windfalls (Strategic Policy) allocates both residential and mixed-use sites. The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities, but if existing employment uses are converted into residential uses despite being identified as suitable for employment in the Exeter Employment Land Study, there is potential for adverse effects. The same applies to the residential aspects of the allocated mixed-use sites, currently in employment use. Mixed-use sites are, however, expected to have positive effects in relation to this objective because they will incorporate some element of employment generating uses. Policy H2 was found to have a mixed significant negative and minor positive but uncertain effect overall for SA Objective 3: Economic Growth because although employment generating uses will be delivered through the mixed-use sites, some of the existing employment generating uses would be converted into residential use, although it is unknown how much of the existing employment uses would be retained. Two of the sites allocated for residential development is also identified as suitable for employment use and would result in the existing employment use being converted to residential.

6.494 Other measures in the Plan which seek to protect and enhance the environment within and around Exeter City will have indirect positive effects on the economy by making the area more appealing and attractive to businesses and workers.

6.495 Overall, the Publication Plan is expected to have a cumulative significant positive effect (++) on SA Objective 3: Economic Growth.

SA Objective 4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities

6.496 The Publication Plan includes a number of objectives and various policies that will combine to improve the health and wellbeing of local people, both directly and indirectly. In particular, Policies HW1: Health and Wellbeing (Strategic Policy) and IF3: Community Facilities (Strategic Policy) require development proposals to maximise opportunities for achieving positive mental and physical health, in addition to the delivery of new facilities that meet community, social, health and welfare needs, to name but a few. Policy H1 also requires certain development proposals to be subject to a Health Impact Assessment. Policy H16: Residential Amenity and Healthy Homes supports creating healthy environments for future residents. In addition, a number of policies within the 'Homes' section such as Policy H9: Supported housing and Policy H14: Accessible Homes will help reduce inequalities and support healthy living. Other Exeter Plan policies will address health and wellbeing indirectly, in particular those that seek to increase walking and cycling and the protection and enhancement of the natural environment, e.g. through biodiversity net gain. Ecosystems rich in biodiversity have the capacity to remove pollutants from the air and increasing levels of walking and cycling, often facilitated through green infrastructure delivery, has the potential to reduce use of the private car and associated pollutants, which can be damaging to human health. This includes policies within the 'Sustainable Transport and Communications' section and the 'Natural Environment' section.

6.497 The sites allocated in Policy H2: Housing allocations and Windfalls (Strategic Policy) were assessed against this SA objective on the basis of the number of homes they would deliver and the access they provide to existing healthcare facilities and open space. The number of sites that would deliver a considerable amount of new homes whilst also being within close proximity to these services was fairly substantial, yet a number of them also contained open space or sports facilities that could be lost to development, although it was uncertain how much would be lost. Policy H2 therefore received a mixed

significant positive and significant negative but uncertain effect in relation to SA Objective 4. The overall scale of growth proposed through the Exeter Plan could put pressure on existing healthcare facilities such as GP surgeries. However, the Plan makes provision for contributions towards improved health infrastructure commensurate with any additional demand placed on existing provision through Policy H1, whilst Policy IF1: Delivery of Infrastructure (Strategic Policy) is assumed to cover healthcare provision.

6.498 Overall, the Publication Plan is expected to have a cumulative minor positive effect (+) on SA Objective 4: Health.

SA Objective 5: Promote high quality design in new development and improve the character of the built environment

6.499 The Publication Plan includes a number of objectives and various policies that will combine to promote high quality design that improves the character of the built-up area of Exeter. Objective 9, Policy S2: Liveable Exeter Principles (Strategic Policy) and Policy D1: Design Principles (Strategic Policy) in the 'High Quality Places and Design' section of the Plan explicitly address this objective, whilst Policy IF1: Delivery of Infrastructure (Strategic Policy) seeks to support high quality development through infrastructure provision. A number of different policies from different sections within the Plan require careful consideration of measures that influence overall design, such as urban form (Policy CC1: Net Zero Exeter (Strategic Policy)), an enhanced public realm that incorporates street planting (Policy STC2: The transport Hierarchy (Strategic Policy) and Policy NE7: Urban tree canopy), attractive public spaces (Policy RFC1: The future of our centres (Strategic Policy)) and protecting and enhancing the character of the city, which includes its unique historic character (Policy HH1: Conserving and enhancing heritage assets (Strategic Policy)). Policy H5: Build to rent and Policy H6: Co-living housing encourage high quality design when developing housing for these uses.

6.500 All of the site allocations made through Policy H2 have negligible effects on SA Objective 5: Design and the Built Environment because the location of development will not affect the achievement of this objective and effects will instead depend largely on the detailed proposals for sites and their design, which will not be confirmed until planning application stage.

6.501 Overall, the Publication Plan is expected to have a cumulative potential but uncertain minor positive effect (+?) on SA Objective 5: Design and the Built Environment.

SA Objective 6: To support community cohesion and safety

6.502 The Publication Plan includes several objectives and policies that directly seek to support community cohesion and safety, namely objectives 4, 8, 9 and 11 and Policies HW1: Health and Wellbeing (Strategic Policy) and IF3: Community Facilities. Policy HW1 sets out the requirement for HIA for large scale residential developments, which must demonstrate how the proposal will promote community inclusion, and safety and wellbeing, whilst Policy IF3 supports the delivery of new or improved community services and facilities, which may contribute towards greater community cohesion. There are numerous objectives and policies that are not directly aimed at improving community cohesion and safety but which support the delivery of public open space and well-integrated development that incorporates walking and cycling, which will help deliver cohesive neighbourhoods and opportunities for outdoor interactions. These include Policies NE5: Green Circle and D2: Designing-out Crime, IF4: Open Space, Play Areas, Allotments and Sport. Specifically, Policy D2 supports development which demonstrates that crime prevention and creating a safe environment have been integrated into design.

6.503 The effects of new development on safety, including levels of crime and fear of crime will depend on factors such as the incorporation of green space within development which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at

night. However, such issues are not influenced by the location of development sites. Achieving regeneration through new development may, however, help to promote a sense of ownership and community cohesion amongst residents. Although this will depend on the detailed proposals for sites and their design, the location of development will affect social deprivation and economic inclusion by influencing how easily people are able to access job opportunities and decent housing in a given area. For this reason, areas which are identified as most deprived are often those which benefit more from the achievement of regeneration. Sites allocated in Policy H2: Housing Allocation and Windfalls (Strategic Policy) that fall within an area within the 20% most deprived were therefore considered to have a minor positive effect against this objective, with Policy H2 receiving a minor positive effect overall in relation to this objective.

6.504 Overall, the Publication Plan is expected to have a cumulative minor positive effect (+) on SA Objective 6: Community.

SA Objective 7: To provide good access to services, facilities and education

6.505 The overall scale of growth proposed through the Exeter Plan could put increased pressure on local services, facilities and education, if appropriate provision is not made as part of new developments. While most of the increased pressure will come from residential development, the development of mixed-use sites will also increase pressure for transport infrastructure, as well as some types of services and facilities. However, the Plan makes provision for the delivery of new services, facilities and education through numerous policies, including RFC1: The future of our Centres (Strategic Policy), Policy RFC2: Development in, and affecting, our centres (Strategic Policy) and centres and IF3: Community Facilities. These, alongside numerous other policies, should combine to mitigate the increased pressure from new development. However, Policy STC8: Motorway Service Area (Strategic Policy) could result in the loss of services and facilities to employment land. Therefore, this Policy was found to have minor negative effect on SA Objective 7.

6.506 The sites allocated for residential development, including mixed-use sites, were assessed against this objective on the basis of the number of homes they are likely to deliver and their proximity to the city centre and district/local centres, in addition to primary and/or secondary schools. Although a small number of sites make provision for a considerable number of new homes and are also within close proximity of numerous services, facilities and educational establishments, many are not. As such, Policy H2: Housing allocations and windfalls (Strategic Policy) was found to have a potential but uncertain mixed minor positive and minor negative effect overall against this objective.

6.507 Overall, the Full Draft Plan is expected to have a cumulative minor positive effect (+) on SA Objective 7: Services, Facilities and Education.

SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives

6.508 The Publication Plan includes numerous policies seeking to reduce the need to travel and increase levels of walking, cycling and the use of public transport. These policies will help to mitigate the potential negative effects of the overall scale of growth proposed in the Exeter Plan, which could lead to increased traffic in the area and associated pollution. In particular, the policies in the 'Sustainable Transport and Communications' section of the Plan directly address this issue. Policy STC1: Sustainable Movement (Strategic Policy) seeks to enhance sustainable and active transport choices through a number of measures including a prioritised and integrated network of active travel links and a frequent and attractive standard of public transport. Policy STC2: The transport Hierarchy (Strategic Policy) makes provision for active travel, public transport and shared mobility, in addition to electric vehicles, whilst Policies STC3: Supporting Active Travel (Strategic Policy) and STC4: Supporting Public Transport (Strategic Policy) provide further details on the active travel and public transport networks mentioned in Policy STC1. While Policy STC3 will result in improvements to the highways network, which could be seen as

discouraging a modal shift to sustainable and active modes of transport, it is noted that addressing existing severance challenges could help reduce congestion and pockets of pollution in these areas. Policy STC7: Safeguarding transport infrastructure (Strategic Policy) safeguards a total of eight sites for future transport infrastructure.

6.509 The sites allocated in Policy H2: Housing allocations and Windfalls (Strategic Policy) were assessed against SA objective 8 on the basis of their proximity to sustainable transport links. Almost all of the sites allocated by Policy H2 were found to be within close proximity of a railway station and therefore a significant positive effect was recorded against this objective.

6.510 Overall, the Publication Plan is expected to have a cumulative mixed significant positive and minor negative effect (++/-) on SA Objective 8: Sustainable Travel.

SA Objective 9: To protect residential amenity by reducing air, noise and light pollution

6.511 The likely cumulative effects of the Exeter Plan on SA Objective 9: Pollution are closely linked to levels of car use, although it is acknowledged that this objective also deals with other forms of pollution, specifically noise and light pollution that may be generated from other sources. Policy HW2: Environmental quality, pollution and contaminated land is the main Policy which covers reducing and mitigating potential adverse impacts from emissions and light, dust, vibration and noise pollution. This Policy will help reduce levels of pollution from development and lower the potential for unacceptable impacts. As is the case with SA Objective 8: Sustainable Travel, the Plan includes numerous policies and objectives that seek to reduce the need to travel, which will have the effect of minimising air and noise pollution triggered by use of the private car. These policies will help to mitigate the potential negative effects of the overall scale of growth proposed. As was the case with SA Objective 8, the policies in the 'Sustainable Transport and Communications' section address car use, which will minimise pollution for the reasons outlined under SA Objective 8.

With regard to residential amenity, Policy EJ2: Retention of Employment Land (Strategic Policy) supports the loss of employment land to an alternative use where the current employment uses have an unacceptable amenity impact of local residents. In addition, a number of policies within the 'Homes' section, including Policy H8: Homes for older people, Policy H9: Supported Housing, Policy H10: Purpose Built Student Accommodation and Policy H11: Gypsy and Traveller Accommodation encourage development to be located near services and facilities and sustainable transport links which could minimise the need to travel by private car and associated emissions.

6.512 The sites allocated in Policy H2: Housing allocations and Windfalls (Strategic Policy) were assessed against SA Objective 9 on the basis of their proximity to an AQMA, and whether they are within the flightpath of Exeter Airport or close to the M5, and therefore vulnerable to noise pollution. Almost all of the allocated sites were within close proximity of an AQMA but only a couple are susceptible to noise pollution as a result of the M5. However, impacts on air quality from sites allocated through Policy H2 should be mitigated to some extent by other policies within the Exeter Plan.

6.513 Overall, the Publication Plan is expected to have a cumulative mixed minor negative and minor positive effect (-/+) on SA Objective 9: Pollution.

SA Objective 10: To conserve and enhance biodiversity and geodiversity

6.514 The large-scale housing and mixed-use growth proposed through the Exeter Plan could have negative effects on biodiversity, particularly where development is proposed on greenfield land (although the overall strategy seeks to focus most development on brownfield land). However, it is recognised that brownfield land can still harbour valuable biodiversity. The individual development sites allocated in the Exeter Plan in Policy H2: Housing Allocations and Windfalls (Strategic Policy) have been assessed against this objective on the basis of their proximity to internationally and nationally designated biodiversity or geodiversity sites, and whether they contain an existing green

infrastructure asset that could be lost as a result of development. There are potential opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore although proximity to designated sites provides an indication of the potential for adverse effects, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Additionally, the potential impacts of biodiversity present at each site or within close proximity to each development site, would be determined once more specific proposals are developed and submitted as part of a planning application. A large proportion of the sites allocated by Policy H2 were found to have potential significant negative but uncertain effects on biodiversity.

6.515 The Publication Plan includes various policies which specifically aim to protect and enhance biodiversity, and so may serve to mitigate the potential adverse impacts of the new development proposed, particularly the policies in the 'Natural Environment' section of the Exeter Plan. Policy NE3: Biodiversity (Strategic Policy) explicitly seeks to protect, enhance and restore biodiversity, whilst Policy NE4: Green Infrastructure (Strategic Policy) seeks to protect and enhance the existing green infrastructure network and support the delivery of new green infrastructure. Policy NE6: urban greening factor supports the use of the assessment tool to ensure urban greening is incorporated into the development. In addition, Policy CC9: Water Quantity and Quality ensures that there should be no harm on the ecological status of Exeter's water bodies.

6.516 A Habitats Regulations Assessment (HRA) was undertaken by Footprint Ecology in relation to the Publication Plan. At the screening stage, likely significant effects were identified in relation to the Exe Estuary SPA and Ramsar Site (general urban effects, recreation and hydrological effects); East Devon Heaths SAC and SPA (recreation); and, Dawlish Warren SAC (recreation). Following Appropriate Assessment, adverse effects on the integrity of these Habitats Sites were ruled out, both alone and in-combination.

6.517 Overall, the Publication Plan is expected to have a cumulative mixed minor positive and minor negative but uncertain effect (+/-?) on SA Objective 10: Biodiversity and Geodiversity.

SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape

6.518 Exeter is located within the Devon Redlands National Character Area, which is characterised by red sandstone and consequent red soil, with ploughed fields, cliffs and exposures dominating the landscape. The topography has been created by rivers and the area in which Exeter is located comprises the flint-topped Haldon Hills. The large-scale new development to be delivered through the Exeter Plan could have adverse effects on the character and quality of the landscape; however, it also offers opportunities to achieve enhancements through high quality and appropriately located new development which may benefit the townscape. The sites allocated in Policy H2: Housing allocations and windfalls (Strategic Policy) have been assessed against this objective on the basis of whether they are located within an area designated in the Landscape Sensitivity Study as having low, medium or high landscape sensitivity. Most of the allocated sites are outside of the most sensitive areas, although a number are in areas of high or medium-high landscape sensitivity.

6.519 The Publication Plan incorporates a Policy that specifically aims to conserve and enhance the quality and character of the landscape (Policy NE1: Landscape setting areas (Strategic Policy)). Policies relating to the provision of green infrastructure will benefit the overall character and appearance of the area (e.g. Policy NE4: Green Infrastructure (Strategic Policy)), while policies requiring high quality design will also provide mitigation (e.g. Policies CC1: Net Zero Exeter (Strategic Policy), HH1: Conserving and enhancing Heritage Assets (Strategic Policy) and D1: Design Principles (Strategic Policy)). Policy CC1: Net Zero Exeter (Strategic Policy) also supports landscape-led schemes with Policy H11: Gypsy and Traveller Accommodation and Policy IF6: New Cemetery Provision ensuring there is not an unacceptable impact on landscape as a result of development. It is also important to note that a lot of the site allocations comprise brownfield land and therefore redeveloping these brownfield sites, many of which are disused, is likely to enhance the townscape.

6.520 Overall, the Publication Plan is expected to have a cumulative mixed minor positive and minor negative but uncertain effect (+/-?) on SA Objective 11: Landscape.

SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets

6.521 The large-scale housing and mixed-use development that is proposed in the Exeter Plan could have negative effects on the cultural heritage of Exeter, for example by impacting upon the setting of heritage assets. In Exeter, there are over 1,900 Listed Buildings, 20 Conservation Areas and 80 Scheduled Monuments. The initial assessment of site options against this objective was based on a Heritage Impact Assessment undertaken by Exeter City Council. Due to the fact that most of the sites allocated in Policy H2: Housing allocations and windfalls (Strategic Policy) were rated yellow in the Heritage Impact Assessment indicating that development of these sites has the potential to cause harm to the significance of the historic environment/heritage asset, their development is considered likely to have adverse effects on the historic environment. However, this effect is also dependent on factors such as the design of development.

6.522 A number of objectives and policies address the protection and enhancement of the historic environment and so should help mitigate the potential negative effects of new development on cultural heritage. In particular, objective 7 and Policy HH1: Conserving and enhancing Heritage Assets (Strategic Policy) require development proposals to protect and enhance the unique historic character of Exeter, its cultural offering and identity. Policy HH5: Conserving and enhancing Exeter's City Walls specifically protects the fabric and setting of the City Walls while potentially requiring some proposals to contribute to the maintenance and enhancement of these walls. Policies HH2: Conservation Areas and HH3: Archaeology provide specific protection for these assets. In addition, Policy RFC1: The future of our Centres (Strategic Policy)

supports a mixture of development proposals in the city, including cultural proposals that may promote access to, enjoyment and understanding of the historic environment. Policy D1: Design Principles (Strategic Policy) does not explicitly protect the historic environment, but sensitive and high quality development is likely to help protect heritage assets and their settings.

6.523 Overall, the Publication Plan is expected to have a cumulative mixed minor positive and minor negative but uncertain effect (+/-?) on SA Objective 12: Cultural Heritage.

SA Objective 13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources

6.524 The River Exe is the primary watercourse within Exeter, which runs north-west to south-east through the centre of the city. Land adjacent to the river is categorised as falling within Flood Zones 2 and 3. The areas most at risk of flooding include parts of lower Exwick, the lower part of St David, St Thomas, Marsh Barton, The Quay, Countess Weir, Topsham, Alphington and the Monkerton area of Pinhoe.

6.525 The overall scale of development proposed in the Exeter Plan could result in an increased risk of flooding, particularly if development is on greenfield land or in areas of high flood risk. The site allocations were assessed against SA Objective 13: Water on the basis of which flood zone they fall within and whether they are at risk of surface water flooding, as well as whether they contain a water body or water course, or fall within a Source Protection Zone. Policy H2: Housing allocations and Windfalls (Strategic Policy) is likely to have an overall significant negative effect in relation to this objective because many of the allocated sites are entirely or mainly located within Flood Zone 3, in addition to falling within an area with a 1 in 30 year risk of surface water flooding.

6.526 However, the Publication Plan includes a number of policies seeking to mitigate flood risk, in particular Policy CC8: Flood Risk (Strategic Policy) and to a lesser extent, Policies CC1: Net Zero Exeter (Strategic Policy) and NE2: Valley Parks (Strategic Policy). A number of policies (Policy CC4: Ground-mounted photovoltaic arrays and IF6: New Cemetery Provision) do not support development within areas at a high risk of flooding. Further to this and as described below, most of the site allocations comprise brownfield land. Therefore, it is unlikely that redevelopment of those sites would contribute to an increased flood risk.

6.527 Overall, the Publication Plan is expected to have a cumulative minor negative effect (-) on SA Objective 13: Water.

SA Objective 14: To support efficient use of resources, including land and minerals

6.528 Only a small number of policies in the Publication Plan are expected to have an effect on this SA objective. This is because the objectives and most of the Plan policies do not explicitly address this objective. Policy S1: Spatial Strategy (Strategic Policy) supports the development of brownfield sites with the Local Plan allocating a small amount of greenfield development. Policy H3: Regeneration opportunity areas (Strategic Policy) supports development proposals for a mix of uses including residential development that make efficient use of brownfield land. Policy EJ2: Retention of Employment Land (Strategic Policy) seeks to retain established employment areas and where the loss of employment land to an alternative use is acceptable, the land will be allocated for redevelopment. This represents an efficient use of previously developed land. Likewise, Policy RFC1: The Future of our Centres (Strategic Policy) and Policy RFC2: Development in, and affecting, our Centres (Strategic Policy) is likely to promote the use of previously developed land within the city centre and district and local centres, limiting development outside of these more built-up areas and potentially on best and most versatile agricultural land. In addition, Policy HW2: Environmental quality, pollution and contaminated land supports

development proposals on land affected by contamination, pollution or poor standards of amenity. This will encourage development on brownfield land.

6.529 Most of the sites allocated in Policy H2: Housing Allocations and Windfalls (Strategic Policy) comprise brownfield land and their redevelopment would represent an efficient use of previously developed land. However, a small number of the sites are predominantly greenfield and located on best and most versatile agricultural land, with likely adverse effects on this objective. Policy H2 was found to have a mixed significant positive and significant negative effect overall in relation to this objective.

6.530 Overall, the Publication Plan is expected to have a cumulative mixed significant positive effect and minor negative (++)/- effect on SA Objective 14: Resources.

Summary of Cumulative Effects of the Full Draft Plan

6.531 Table 6.17 summaries the likely overall cumulative effect of the Publication Plan on each of the 14 SA objectives, as described above.

Table 6.17: Summary of cumulative effects of the whole Publication Plan

SA Objectives	Exeter Plan
SA1: Climate Change	++/-
SA2: Housing	++
SA3: Economic Growth	++
SA4: Health	+

SA Objectives	Exeter Plan
SA5: Design and the Built Environment	+?
SA6: Community	+
SA7: Services, Facilities and Education	+
SA8: Sustainable Travel	++/-
SA9: Pollution	+/-
SA10: Biodiversity and Geodiversity	+/-?
SA11: Landscape	+/-?
SA12: Cultural Heritage	+/-?
SA13: Water	-
SA14: Resources	++/-

Duration of Effects

6.532 The Publication Plan sets out how growth will be planned, facilitated and managed over the Plan period up to 2041. Effects may be experienced in the short-term (defined for this SA as over the next five years), medium-term (defined as over the next 10 years), or long-term effects (defined as over the whole Plan period). Given the nature of the policies in the Publication Plan, it is difficult to be precise about when, where and in what form all the effects will arise, and how one effect might relate to another. However, it is possible to draw some broad conclusions about the nature and interrelationship of the effects that the SA has identified.

6.533 Most of the effects will be long-term, in that the Publication Plan aims to facilitate and manage growth and associated infrastructure that will last over time. There will be some temporary and short- or medium-term effects during site allocation preparation, construction or operation (see below).

6.534 The effects which have been identified in the appraisal of the Publication Plan, both positive and negative, are likely to increase over time, as the policies in the plan are implemented, and more developments are delivered in the City.

Short-term Effects

6.535 The effects of the Publication Plan in the short-term are mostly related to the initial impacts of commencing development early in the Plan period. These will include the removal of vegetation, soil, and provision of infrastructure required. Such works could have negative impacts on biodiversity, health and well-being, amenity of local communities (possible disruption to rights of way, traffic flows, noise generation, vibration, dust etc.), soil quality, and the landscape. However, these impacts are temporary in nature, and some may be minimised through good design, adherence to the policies in the Publication Plan or reversed through restoration measures in the long-term.

Medium-term Effects

6.536 Medium-term positive effects relate to the employment and economic benefits of development, new communities and employment centres. Negative effects in the medium-term include the implications of having greater densities of residents and workers in parts of the City on health and well-being, the amenity of local communities (e.g. noise, increased traffic etc.), and on environmental quality. However, these impacts should be avoided or mitigated through the adherence to the policies in the Publication Plan when planning proposals are assessed and determined by the City Council.

Long-term Effects

6.537 Long-term, permanent benefits that would result from the Publication Plan include the provision of sufficient homes, new service, facilities and infrastructure and employment opportunities to meet the City's needs. New

developments will also enable flood alleviation schemes, habitat creation and biodiversity enhancement, recreation enhancement as well and the conservation of the City's landscapes and historic environment. Long-term, permanent negative impacts of the Publication Plan are potentially: loss of habitats and areas of Best and Most Versatile Agricultural Land; and climate change implications of the energy required to power new homes and businesses and vehicle movements to and from waste sites, at least until zero carbon alternatives are fully implemented towards the end of the Plan period.

Recommendations

6.538 A number of recommendations were made at the Outline Draft Plan and Full Draft Plan stages, which were responded to by the Council at that time. Further recommendations were made in a draft version of this SA Report for the Publication Plan. All recommendations made at both stages are listed in the following section below along with information about how the Council has responded to these recommendations.

Recommendations made and Exeter City Council responses

Policy CC4: Ground-mounted Photovoltaic Arrays

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage

- N/A
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - Policy CC4 wording has been updated to ensure no adverse effects on any other known sites of biodiversity interest.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy CC7: Solar-ready development

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - Policy CC7 has been updated to ensure no unacceptable impacts on the historic and built environment.
 - Policy now falls under Policy CC7: Development that is Adaptive and Resilient to Climate Change
- Further recommendations made at Publication Plan stage

- None.
- Exeter City Council's response
 - N/A

Policy CC8: Flood Risk (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - Additional detail could be added to the policy, such as the requirement for a site-specific Flood Risk Assessment to be submitted for development proposals within areas more vulnerable to flood risk.
- Exeter City Council's response
 - An additional sentence will be added in the Policy referring to a site-specific flood risk assessment.
- Updates to Policy since Outline Draft Plan stage
 - Policy CC8 wording has been updated.
- Further recommendations made at Full Draft Plan stage
 - x
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy H11: Gypsy and Traveller Accommodation

- Recommendation made at Outline Draft Plan Stage

- N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - N/A
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - Policy H11 could require no unacceptable harm on the historic environment and heritage assets.
 - The Policy could be supportive of development on brownfield land.
- Exeter City Council's response
 - No change made. Other policies in the Exeter Plan cover the need to conserve and enhance the historic environment and the plan should be read as a whole.

Policy H16: Residential Amenity and Healthy Homes

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A

- Further recommendations made at Full Draft Plan stage
 - Reference to the Liveable Exeter Principles could be included within the policy.
- Exeter City Council's Responses to recommendations
 - No change made. H14 applies to all development proposals involving new housing, whereas the Liveable Exeter principles apply only to the strategic brownfield sites and other major development sites that may come forwards.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy EJ1: Economic Growth (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - Policy EJ1 could require development proposals to be located in areas that are easily accessible by public transport, or via walking and cycling.
- Exeter City Council's response
 - “Appropriate” now added to Policy requirements and additional wording added to supporting text covering appropriate locations. Future policies covering suitable locations for employment space will come forward in future policy.
- Updates to Policy since Outline Draft Plan stage
 - Policy EJ1 wording has been updated.
 - Policy EJ6: New transformational employment allocations has been included in the Draft Local Plan.
- Further recommendations made at Full Draft Plan stage

- None.
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy EJ6: New Transformational Employment Allocations (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - N/A
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - Policy EJ6 could include mitigation to ensure no adverse impact of development on the historic environment and/or heritage assets.
- Exeter City Council's response

- No change made. Other policies in the Exeter Plan cover the need to conserve and enhance the historic environment and the plan should be read as a whole.

Policy RFC1: The Future of our Centres (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - Reference to the night-time economy could be added to Policy HS1.
 - Wording could be added to Policy HS1 that requires development to take into consideration the character of the area, including any heritage assets, and to be sympathetic to the surrounding townscape.
- Exeter City Council's response
 - Reference has now been made to the night-time economy in the policy.
 - HH1 already covers this topic in depth and so we don't think it's beneficial to add further reference here.
- Updates to Policy since Outline Draft Plan stage
 - Policy HS1 wording has been updated to include reference to night-time economy.
- Further recommendations made at Full Draft Plan stage
 - Reference to visitor economy could be added to Policy HS1.
- Exeter City Council's Responses to recommendations
 - Policy HS1 wording has been updated to include reference to the visitor economy.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy STC4: Supporting Public Transport (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - The Policy could require development proposals to provide "high quality and safe access to public transport".
- Exeter City Council's Responses to recommendations
 - Policy STC4 wording has been updated to include reference to safe public transport.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy NE1: Landscape Setting Areas (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - The Policy could require any new development within the Landscape Setting Area to require effective landscaping.
- Exeter City Council's response

- The Council does not wish to specifically refer to particular things that might make development acceptable in the landscape setting as this could be counterproductive to the aim of the policy. The Council would want any developer to justify proposals on their own merits, which might include landscaping (and indeed, depending on the circumstances landscaping may not always be required).
- Updates to Policy since Outline Draft Plan stage
 - No change to the Policy was made.
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy NE2: Valley Parks (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - The Policy could include reference to ecological enhancements.

- Exeter City Council's Responses to recommendations
 - Policy NE2 has been updated to include reference ecological enhancement.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy NE3: Biodiversity (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - The Policy could make reference to SuDS and the fact they can improve the biodiversity value of an area.
- Exeter City Council's response
 - Policy CC8 already requires SUDS so the Council does not feel it necessary to repeat it here.
- Updates to Policy since Outline Draft Plan stage
 - No change to the Policy was made.
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy NE4: Green Infrastructure (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - The Policy could make reference to SuDS, which are an increasingly important feature of green infrastructure networks.
 - The Policy name and wording could be amended to refer to the green and blue infrastructure network, which includes rivers, lakes, canals and ponds.
- Exeter City Council's response
 - Policy CC8 already requires SUDS so the Council does not feel it necessary to repeat it here. Supporting text in 9.18 already refers to this also incorporating blue infrastructure and the term "green infrastructure" is consistent with existing work the Council has undertaken and DCC and NE terminology.
- Updates to Policy since Outline Draft Plan stage
 - No change to the Policy was made.
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy NE7: Urban Tree Canopy Cover

- Recommendation made at Outline Draft Plan Stage

- N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - No change made. This is covered off in the supporting text to the policy.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy D1: Design Principles (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - Policy D1 could make reference to the waste hierarchy and the circular economy.
- Exeter City Council's response
 - No change made – Policy CC1 already refers to the circular economy which also covers the waste hierarchy.
- Updates to Policy since Outline Draft Plan stage
 - No change to the Policy was made.
- Further recommendations made at Full Draft Plan stage
 - N/A

- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy D3: Advertisements

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - Policy could ensure proposals take into account local townscape.
- Exeter City Council's Responses to recommendations
 - No change made. Townscape is sufficiently covered in the point considering the character of buildings, their settings and the wider area.
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy IF1: Delivery of Infrastructure (Strategic Policy)

- Recommendation made at Outline Draft Plan Stage
 - Policy IC1 could specify the different types of infrastructure that will be delivered, instead of just referring to the Infrastructure Delivery Plan.
- Exeter City Council's response
 - The Policy already refers to physical, social, economic and green infrastructure. The Council does not yet know the specific infrastructure projects that will be required so cannot yet be any more specific.
- Updates to Policy since Outline Draft Plan stage
 - No change to be Policy was made.
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy IF3: Community Facilities

- Recommendation made at Outline Draft Plan Stage
 - There could be a requirement within Policy IC2 for any new community facilities to help mitigate the effects of climate change through, for example, building orientation and the fabric first approach.
- Exeter City Council's response

- Both CC1 and D1 already cover this issue so the Council does not think it's necessary to repeat it here.
- Updates to Policy since Outline Draft Plan stage
 - No change to be Policy was made.
- Further recommendations made at Full Draft Plan stage
 - None.
- Exeter City Council's Responses to recommendations
 - N/A
- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Policy IF5: New Cemetery Provision

- Recommendation made at Outline Draft Plan Stage
 - N/A
- Exeter City Council's response
 - N/A
- Updates to Policy since Outline Draft Plan stage
 - N/A
- Further recommendations made at Full Draft Plan stage
 - Policy could ensure no unacceptable impact on local biodiversity.
- Exeter City Council's Responses to recommendations
 - Policy IC6 wording has been updated to include reference to biodiversity.

Chapter 6 Sustainability Appraisal Findings for the Publication Plan

- Further recommendations made at Publication Plan stage
 - None.
- Exeter City Council's response
 - N/A

Chapter 7

Monitoring

7.1 The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

7.2 Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Indicators are therefore included for the SA objectives against which significant (including uncertain) effects have been recorded.

7.3 The section overleaf sets out suggested indicators for monitoring the potential sustainability effects of the Exeter Plan.

7.4 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the City Council continues the dialogue with statutory environmental consultees and other stakeholders that has already commenced and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Proposed SA monitoring framework for the Exeter Plan

SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change

Indicators

- Percentage of major applications accompanied by a Net Zero Statement
- Amount of electricity (MW) generated from renewables in the city.
- Number of homes connected to energy networks
- Percentage of qualifying development proposals that comply with Future Homes Standard and Future Buildings Standard

Possible Data Sources

- Local Development Order
- Planning applications

SA Objective 2: To provide a suitable supply of high quality housing including appropriate mix of types and tenures

Indicators

- Number of additional homes permitted
- Number of additional homes completed.
- Number of homes permitted on allocated sites.
- Average percentage and tenure split of affordable housing secured on sites of ten homes or more, or with a site area of 0.5 hectares or more.
- Number of serviced plots for custom and self-build homes delivered.
- Completion of purpose built student accommodation bedspaces.
- Delivery of permanent Gypsy and Traveller pitches.
- Percentage of affordable new build homes built to Building Regulations M4(3) (wheelchair user homes) standard.

Possible Data Sources

- Planning applications
- Council tax records

SA Objective 3: To support sustainable and diverse growth of the City's economy and maximise employment opportunities

Indicators

- Planning decisions citing the Liveable Exeter principles.
- Amount of employment floorspace permitted.
- Amount of employment floorspace lost within the established employment areas.
- Amount of floorspace permitted for new forms of employment provision (e.g. work hubs, collaborative workspaces).
- Amount of additional transformational employment floorspace permitted at the allocated employment sites.
- The retention and enhancement of cultural and tourism facilities.
- Number of major applications submitted with an Employment And Skills Plan.

Possible Data Sources

- Planning applications

SA Objective 4: Improve the physical health and wellbeing of residents and reduce health inequalities

Indicators

- Proportion of large scale residential development proposals with a development for over 30 homes or 1000 sq metres that provide a Health Impact Assessment (HIA).

Possible Data Sources

- Planning applications
- Health Impact Assessments

SA Objective 5: Promote high quality design in new development and improve the character of the built environment

Indicators

- Proportion of new development coming forward on brownfield land.
- Proportion of major development proposal permitted in accordance with Policy D1.

Possible Data Sources

- Planning applications

SA Objective 6: To support community cohesion and safety

Indicators

- Retention and protection of built community facilities.
- Provision of open space with strategic mixed use brownfield developments.

Possible Data Sources

- Planning applications

SA Objective 7: To provide good access to services, facilities and education

Indicators

- Footfall in the city centre.
- City centre vacancy rates.
- Total value of CIL receipt.
- Total value of CIL set out in all demand notices issued.
- Total value of Section 106 receipts.
- Total value of contributions to be provided under any Section 106 Agreements signed

Possible Data Sources

- Planning applications
- Annual infrastructure funding statement

SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives

Indicators

- Number of cycling trips.
- Increase in city bus and rail patronage.
- Low-car and car-free development accompanied by controlled parking zones.

Possible Data Sources

- Planning applications

SA Objective 9: To protect residential amenity by reducing air, noise and light pollution

Indicators

- Proportion of new development coming forward adjacent or near to AQMAs.

Possible Data Sources

- Planning applications

SA Objective 10: To conserve and enhance biodiversity and geodiversity

Indicators

- Level of increase in biodiversity delivered by development.
- Number of large scale residential development proposals accompanied by a Green Infrastructure Plan.
- Number of major development proposals meeting urban greening score requirements.
- Tree canopy cover in major new developments proposals.

Possible Data Sources

- Planning applications

SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape

Indicators

- Areas of land lost to development in landscape setting area contrary to policy.
- Areas of Valley Park lost to development.

Possible Data Sources

- Planning applications

SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets

Indicators

- Number of applications permitted contrary to Historic England advice.

Possible Data Sources

- Planning applications
- Conservation Area Appraisals
- Exeter viewpoints, density and heights study

SA Objective 13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources

Indicators

- Number of applications permitted contrary to Environment Agency advice.
- Percentage of water bodies at good ecological status or potential.
- Percentage of water bodies assessed at good chemical status.

- Percentage of new homes achieving average water use of 110 litres per person per day.

Possible Data Sources

- Planning applications
- EA information

SA Objective 14: To support efficient use of resources, including land, minerals and waste

Indicators

- Percentage of homes permitted on brownfield sites.

Possible Data Sources

- Planning applications

Chapter 8

Conclusions

8.1 The SA of the Publication Plan has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. SA objectives developed at the Scoping stage of the SA process have been used to undertake a detailed appraisal of the current consultation document and the reasonable alternative options considered.

8.2 The Publication Plan document sets out detailed proposed policies to address strategic and non-strategic issues in the plan area, as well as identifying specific site allocations for residential and mixed use development. Due to the overall scale of development proposed in the Publication Plan, adverse effects have inevitably been identified in relation to some of the SA objectives, in particular relating to biodiversity, the landscape and the historic environment. Some of these effects have the potential to be significant. However, the development proposed will meet the identified need for housing and economic development in the City, benefiting the social and economic sustainability topics considered.

8.3 The Publication Plan is likely to have an overall positive cumulative effect on the majority of the SA objectives. Where there are potential negative effects identified (e.g. on biodiversity and geodiversity, landscape and cultural heritage), these are largely uncertain because they will depend on factors such as the detailed design and layout of new developments proposed on allocated sites, which are unknown at this stage. However, there are a number of strong development management policies in the Plan that will help to mitigate the potential effects identified. The remaining negative cumulative effects identified in Chapter 6 (e.g. on climate change, sustainable travel, pollution and water) reflect the overall scale of development that is proposed to be delivered in Exeter, which will inevitably result in increased carbon emissions from buildings, commercial activities and road traffic, flood risk and the loss of some greenfield land despite the strong mitigation built into the Plan and the overall strategy of directing most development to brownfield sites.

8.4 Health infrastructure and community services and facilities should be planned in and delivered in advance or alongside new development, and this is being addressed through Policy IF1: Delivery of Infrastructure (Strategic Policy) and the supporting Infrastructure Delivery Plan. There are also measures in the Plan to achieve net zero and encourage a switch to active and public travel, and wider government initiatives should help to reduce road travel overall, car emissions and therefore air pollution and climate change. Most of the growth required is focused on large, strategic brownfield sites including Regeneration Opportunity Areas, in locations close to the city centre, district centres, local centres and key public transport hubs, an approach which should maximise the positive effects and minimise the negative effects of new development.

Next Steps

8.5 This SA Report will be available for comment alongside the Publication Plan between December 2024 and February 2025. The consultation responses on the Publication Plan and this SA Report will be reviewed and considered before the plan is submitted for examination.

LUC

December 2024

Appendix A

Consultation Comments Received in Relation to Previous SA Documents

A.1 A six-week consultation was carried out on the SA Scoping Report for the Exeter Plan from 6th April to 17th May 2022. Consultation on the Outline Draft Plan took place between 26th September and 19th December 2022. Consultation on the Full Draft Plan took place between 23rd October 2023 and 15th January 2024.

A.2 The sections below set out a summary of the comments received during each consultation and the SA team's response to these comments.

Consultation comments from statutory consultees in relation to the SA Scoping Report

Environment Agency

Chapter 2: Relevant Plans and Programmes

Comment

A.3 We are pleased to see inclusion of Defra's 25 Year Environment Plan.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

A.4 The document also includes the 2011 national flood and coastal erosion risk management strategy for England. However, this should now refer to the 2020 national flood and coastal erosion risk management strategy for England.

A.5 There are a number of others we consider should be included:

- Devon Local Flood Risk Management Strategy 2021-2027 (DCC)
- South West River Basin District Flood Risk Management Plan 2015-2021 (EA). A new plan will be published later this year.
- Water Industry National Environment Programme 2020-2025 (and associated South West Water business plan)
- South West River Basin Management Plan

SA Team's Response/Action Taken

A.6 Updated to refer to the 2020 national flood and coastal erosion risk management strategy for England.

A.7 These additional plans have been included where relevant.

Chapter 3: Baseline Information

Comment

A.8 We consider that the section on baseline biodiversity should also include priority habitats. Inter-tidal habitats like mud flats and saltmarsh are priority habitats which are at risk of being squeezed as a result of encroaching development and sea level rise. These habitats also play an important role in sequestering carbon and therefore mitigating climate change.

SA Team's Response/Action Taken

A.9 The baseline information has been updated to acknowledge priority habitats.

Comment

A.10 Paragraph 3.98 regarding the climate change baseline summarises the challenges well. However, it needs to clearly acknowledge and address the fact that climate change adaptation is just as crucial as mitigation. It is, of course, essential that all areas play their part in helping the World move towards achieving net-zero carbon emissions but a degree of climate change is now unavoidable. Whilst achieving zero carbon at the district level will have little overall effect on global emissions, ensuring the district can adapt and is resilient to the inevitable impacts of climate change will make a big difference to long-term sustainability locally. It is therefore essential that local areas do all they can to ensure they adapt and are resilient to the profound environmental, economic and social impacts of climate change in terms of flood risk, extreme heat, habitats and water resources.

SA Team's Response/Action Taken

A.11 The baseline information has been updated to acknowledge this.

Comment

A.12 The baseline section on climate change predictions should also include links to the climate change allowances for sea level rise, peak rainfall and other factors.

SA Team's Response/Action Taken

A.13 This information will be taken account of in the new Strategic Flood Risk Assessment which will be prepared to support development of the new Local Plan, which the SA will take account of.

Comment

A.14 The flood risk baseline covers most of what it should. However, we recommend that it also include more on surface water flood risks and the role of Devon County Council as Lead Local Flood Authority.

SA Team's Response/Action Taken

A.15 The baseline information has been updated to include the additional information.

Comment

A.16 Paragraph 3.146 in the section on water quality baseline refers to the Water Framework Directive ecological status of water bodies across Devon and the various reasons for not achieving good. The Sustainability Appraisal of the Exeter Local Plan should focus on the water bodies within and downstream of Exeter. There are 7 waterbodies that meet these criteria. They are, with their current ecological status:

- North Brook – Moderate Ecological Status
- River Exe (Creedy to Estuary) – Moderate Ecological Status
- Alphin Brook – Good Ecological Status
- Matford Brook – Moderate Ecological Status
- Upper Clyst – Moderate Ecological Status

Appendix A Consultation Comments Received in Relation to Previous SA Documents

- Lower Clyst – Moderate Ecological Status
- Exe Estuary – Moderate Ecological Status

A.17 The target is for water bodies to achieve Good Ecological Status by 2027. Therefore the local plan should be considering how it can assist those water bodies below good status to improve, not just ensuring there is no deterioration. More information on the ecological status and reasons for not achieving ‘good’ can be found via the Devon East Management Catchment [\[See reference 15\]](#).

SA Team’s Response/Action Taken

A.18 The baseline information has been updated to make reference to the 7 waterbodies.

Historic England

Chapter 2 and Appendix A: Relevant Plans, Policies and Programmes

Comment

A.19 Historic England has considered the information provided in Chapter 2 and Appendix A of the Scoping Report from an historic environment/cultural heritage perspective. We welcome the inclusion of paragraphs 2.25-2.26, 2.39 as well as 2.40.

A.20 We have the following suggestions for additional items that could usefully be included either in Chapter 2 in paragraph 2.40 and/or in Appendix 2:

Appendix A Consultation Comments Received in Relation to Previous SA Documents

- International – The European Convention on the Protection of Archaeological Heritage.
- National – Planning (Listed Buildings & Conservation Areas) Act 1990; Ancient Monuments & Archaeological Areas Act 1979; Marine and Coastal Access Act 2009; National Model Design Code (2021); Historic England Future Strategy 2021 [\[See reference 16\]](#); Historic England Corporate Plan 2021-2022 (instead of 2018-2021) [\[See reference 17\]](#); Historic England Heritage at Risk Register (2021) [\[See reference 18\]](#); Strategic Framework for Collaborative Action 2020-2025 by the Historic Environment Forum (instead of Heritage 2020) [\[See reference 19\]](#); GPA1: The Historic Environment in Local Plans (2015) [\[See reference 20\]](#); HEAN 3: Site Allocations (2015) [\[See reference 21\]](#); and GPA3: The Setting of Heritage Assets (2017) [\[See reference 22\]](#).
- Sub-National/Local – South Marine Plan (2018) and associated Seascape Assessment (2014); Urban Capacity Study 2006-2026; conservation area character appraisals and management plans; local list; and Exeter Historic Environment Record (HER).

SA Team's Response/Action Taken

A.21 Noted.

A.22 The baseline references local and national documents only. It is assumed that international documents are translated into National and Local policy.

A.23 Many of the national items listed are not relevant, as some are acts which relate to law not policy, others are Organisational Historic England Documents and relevant to the SA. Relevant national plans listed have been included (e.g. GPA1: The Historic Environment in Local Plans (2015); HEAN 3: Site Allocations (2015); and GPA3: The Setting of Heritage Assets (2017)).

A.24 Relevant sub-national/local documents that have been suggested, have been included. The conservation area character appraisals, management plans,

Appendix A Consultation Comments Received in Relation to Previous SA Documents

local list and Exeter Historic Environment Record are not relevant for inclusion as part of the plans, policies and programmes information. Information and data relating to these suggestions (e.g. heritage assets) will be assessed as part of the appraisal of site options through the SA.

Comment

A.25 We are in broad agreement with the summary of the implications for the Local Plan and SA in the green box under paragraph 2.40. However, we would welcome additional brief text here that recognises the Local Plan's role in encouraging growth, development and infrastructure that has positive impacts/effects or enhances the historic environment, including people's access, understanding and enjoyment of it. Likewise, brief mention that heritage assets can positively contribute to local character and distinctiveness would be useful. This reflects the requirements of paragraphs 189 and 190 of the NPPF.

SA Team's Response/Action Taken

A.26 This additional text has been included.

Chapter 3: Baseline Information – Historic Environment

Comment

A.27 Historic England welcomes the inclusion of paragraphs 3.83-3.91 and the associated Table 3.9 and Figure 3.7 as well as the overview of Exeter's designated and non-designated heritage assets, and Heritage at Risk. We have the following suggestions for changes or additions to the text:

- Paragraph 3.84 – could usefully refer to 'designated heritage assets'.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

- Paragraph 3.85 and its discussion of non-designated heritage assets could shift to after the paragraphs covering Exeter City's designated heritage assets, e.g. listed buildings, conservation areas, registered parks and gardens, and scheduled monuments, for a more logical flow.
- Examples of non-designated heritage assets in Exeter could also be included, e.g. Exeter's Local List, as well as other sources of information used to identify these assets, e.g. conservation area character appraisals, areas of known archaeological potential, Exeter HER.
- The text does not mention that the historic city centre of Exeter is one of five areas designated as an Area of Archaeological Importance under the Ancient Monuments and Archaeological Areas Act 1979.
- The concept of settings and how they can contribute to the significance of heritage assets as well as the importance of the rural, landscaped setting for the City itself could be usefully included, even if to direct readers to the subsequent Landscape section in respect of the latter point.

SA Team's Response/Action Taken

A.28 The proposed changes and additions have been addressed in the historic environment baseline information, where deemed relevant.

A.29 This point is noted, however, non-designated heritage asset information is not critical for consideration, so has not been included.

Chapter 3: Baseline Information – Landscape

Comment

A.30 We have also considered the landscape baseline information (paragraphs 3.92-3.97) and particularly welcome mention of the landscaped and water settings of the City including the hills and ridgelines, green spaces and Valley

Appendix A Consultation Comments Received in Relation to Previous SA Documents

Parks, River Exe and Exe Estuary. We are pleased to see the recognition the relationship between the historic environment and landscape at paragraph 3.97.

SA Team's Response/Action Taken

A.31 Noted.

Chapter 4: Key Sustainability Issues and Likely Evolution with the Plan

Comment

A.32 Historic England has considered the key sustainability issues for heritage assets and landscape. While we agree with the thrust of these, the way the heritage asset sustainability issue is worded appears to conflate or confuse heritage at risk (meaning Historic England's Register and programme) with the risks posed to the significance and settings of heritage assets from poorly planned development in terms of siting and design. A re-wording would help here.

A.33 We have two further points to make about this section, taking into account baseline information:

- We would expect to see some more specific challenges included here relevant to Exeter's situation. We suggested some of these in our response to the Issues Consultation in 2021, e.g. increasing density and accommodating taller buildings, to which we can add the potential for harm to and loss of archaeology from greater brownfield development as well as the paleoenvironmental potential of the River Exe and Exe Estuary. We attach our most recent comments in Appendix A to this letter for ease of reference.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

- Likewise, the new Local Plan also offers important opportunities to address local heritage at risk and encourage heritage-led regeneration, especially for the ‘at risk’ City Walls. It can also encourage new development that draws on heritage assets as a way of fostering local character and distinctiveness. These could usefully be mentioned.

A.34 The Council’s conservation and archaeological advisers would be well placed to help identify relevant local sustainability issues for the SA/SEA, as well as provide comment on the likely evolution without the new Local Plan.

A.35 In respect of the climate change and biodiversity sustainability issues, we would welcome brief acknowledgement that the historic environment can positively contribute to climate change mitigation and adaptation, and to addressing the ecological emergency. There is a wealth of information and advice on Historic England’s website [\[See reference 23\]](#) and in Heritage and the Environment 2020 [\[See reference 24\]](#).

SA Team’s Response/Action Taken

A.36 The Heritage Assets sustainability issue has been re-worded.

A.37 These two additional points are points that will be considered and addressed through specific site options assessments as part of the SA/SEA process, and Local Plan development. These points also relate to the actual wording of the Local Plan and its policies rather than the SA.

A.38 This has been acknowledged in the relevant sections of the baseline information.

Chapter 5: Sustainability Appraisal Framework

Comment

A.39 Historic England has considered the proposed SA Framework and have the following comments to make on the SA Objectives:

- SA Objective 5 – we support this objective and the associated appraisal questions. We suggest that the relevant SEA Topics includes cultural heritage.
- SA Objective 11 – we support this objective and the associated appraisal questions. However, we consider that the effects of policy/options on the townscape (e.g. skyline, key views) and on the landscape and water settings of the City need including as appraisal questions either here or under objective 12. We also suggest that the list of relevant SEA Topics includes cultural heritage and perhaps material assets.
- SA Objective 12 – we strongly support this objective but suggest that ‘heritage features’ is replaced with ‘heritage assets’ given NPPF terminology. We also support the associated appraisal questions. However, we query if the final question is better suited for inclusion under objective 5. We also suggest the list of relevant SEA Topics includes landscape and material assets.

A.40 We note from paragraph 5.3 that site-specific assessment criteria will be developed for each SA objective for the appraisal of site options. We will wait to see how this will be undertaken for the historic environment and landscape. We are also particularly interested to see how the cumulative effects of site allocations will be considered in the SA/SEA. Given this, we cannot yet fully comment on whether the SA Framework is fit for purpose and/or the appropriateness of the site assessment assumptions as requested in paragraph 6.2.

A.41 Finally, we would like to reiterate the need for the SA/SEA and the new Local Plan to be informed by an up-to-date historic environment evidence base,

Appendix A Consultation Comments Received in Relation to Previous SA Documents

bearing in mind paragraphs 31, 32, and 35 of the NPPF 2021. This will help the new Local Plan set out a positive strategy for the conservation and enjoyment of the historic environment in its spatial strategy, allocations and other sites identified for growth and development, so that these avoid harm to irreplaceable heritage assets, minimise and mitigate negative impacts, and maximise enhancements to and enjoyment of the historic environment, taking into account the requirements of NPPF paragraphs 189 and 190. We are pleased to see this need is recognised in the SA Scoping Report, notably at paragraph 2.40 in the green box.

SA Team's Response/Action Taken

A.42 Cultural heritage has been included as a relevant SEA Topic under SA objective 5.

A.43 The first appraisal question has been updated to include townscapes, and cultural heritage has been included as a SEA Topic.

A.44 The wording of heritage features has been amended to heritage assets. The final appraisal question included for SA objective 12 is suited as part of SA objective 12 and SA objective 5. Therefore, it will be captured either way through the SA. It is considered to be more appropriate as part of SA objective 12.

A.45 Noted.

Natural England

Chapter 2: Relevant Plans and Programmes

Comment

A.46 Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area:

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- Shoreline management plans
- Coastal access plans
- River basin management plans
- AONB management plans
- Relevant landscape plans and strategies
- South Marine Plans
- Devon Climate Emergency Plan
- Water Resource Management plans
- Environment Act
- The 25 Year Environment Plan

SA Team's Response/Action Taken

A.47 Noted. The relevant plans applicable to the plan area have been reviewed.

Chapter 3: Baseline Information – Paragraph 3.29 – Greenspace

Comment

A.48 Natural England welcomes the commitment, made by Exeter City Council, to updating the 2005 Parks and Open Spaces Strategy.

SA Team's Response/Action Taken

A.49 Noted.

Chapter 3: Baseline Information – Paragraph 3.33 – Green Infrastructure

Comment

A.50 Natural England welcomes the Council's proactive approach and commitment to delivering green infrastructure. Whilst the 2009 Green Infrastructure Study and Strategy for the Growth Points in and around Exeter is comprehensive, it is starting to date and there could be some merit in reviewing the document to ensure the strategy includes all relevant projects and programmes, and that the approach is consistent with the latest guidance on green infrastructure standards.

A.51 Natural England is developing the Green Infrastructure Framework – Principles and Standards for England to support the greening of our towns and cities. The Framework is a commitment from the Government's 25 Year Environment Plan and will help local planning authorities to assess the quality of green infrastructure in new developments. At present the GI Principles and the

Appendix A Consultation Comments Received in Relation to Previous SA Documents

Mapping Tool are available but following the launch of the full GI Framework later in the year LPAs will also have access to the GI Standards, the GI Design Guide, and a selection of case studies and process journeys.

SA Team's Response/Action Taken

A.52 Noted.

Chapter 3: Baseline Information – Paragraph 3.81 – Biodiversity

Comment

A.53 Natural England advises that it cannot be confirmed that recreational impacts can be screened out for the East Devon Pebblebed Heaths SAC, the East Devon Heaths SPA, the Exe Estuary SPA, and Dawlish Warren SAC until the review of the South East Devon European Mitigation Strategy is complete. The review will need to take into consideration the overall quantum of currently planned and additional growth expected within the Habitats Sites zones of influence, as identified through the review of the Local Plan of each Local Authority in the Partnership.

SA Team's Response/Action Taken

A.54 Noted. All effects from proposed policy and site options will be appropriately assessed, and the findings of the supporting HRA will be taken into account.

Chapter 3: Baseline Information – Paragraphs 3.92 to 3.97 – Landscape

Comment

A.55 Natural England notes that the baseline information on Landscape briefly refers to, but doesn't provide details of, the Devon Character Areas and Landscape Character Types, which can provide a framework for Landscape Sensitivity and Capacity Studies. The Page 3 of 11.

A.56 Sustainability Appraisal informs the preparation of the Local Plan; therefore, the assessment needs to be underpinned by up-to-date landscape sensitivity and capacity evidence in accordance with paragraphs 31 and 174 of the NPPF.

SA Team's Response/Action Taken

A.57 A separate landscape sensitivity study is being undertaken, and the findings of this will inform the SA.

Chapter 3: Baseline Information – Paragraphs 3.112 to 3.114 – Flood Risk and Coastal Change

Comment

A.58 Natural England advises that this section might be the appropriate section to include the baseline information for the approach to coastal management within the Plan area, as set out in the Durlston Head to Rame Head SMP2 and the Exe Estuary flood and coastal erosion risk management strategy (FCERMS).

SA Team's Response/Action Taken

A.59 Noted. Appropriate baseline information has been included for this strategic level of assessment.

Chapter 3: Baseline Information – Paragraphs 3.118 to 3.122 – Air Quality

Comment

A.60 In addition to affecting human health, poor air quality can also affect the natural environment. The UK Air Pollution Information System (APIS) provides data and information on pollutants and their impacts on habitats (incl SACs, SPAs and SSSIs) and species. The SEA should also be informed by/cross-reference to any assessment of the impacts of air quality on Habitats sites undertaken for the HRA.

SA Team's Response/Action Taken

A.61 Noted. The SA will take account of the findings from the supporting HRA.

Chapter 3: Baseline Information – Paragraphs 3.143 to 3.147 – Water Quality

Comment

A.62 Further information on water quality, and other topics, is available within the Exe Estuary Management Plan and the supporting State of the Exe Estuary report.

SA Team's Response/Action Taken

A.63 The baseline information has been updated to include additional information on water quality.

Chapter 3: Baseline Information – General

Comment

A.64 Existing environmental evidence can be gathered from various sources including online data sources like MAGIC, Local Environmental Record Centres (LERCs) and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping.

A.65 Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA). This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities, local nature partnership and the local enterprise partnership.

A.66 Please see the attached annex for our advice on sources of local plan evidence on the natural environment.

SA Team's Response/Action Taken

A.67 Additional, relevant environmental evidence has been used to inform the SA, particularly the appraisal of site options.

Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Open Spaces and Recreation

Comment

A.68 We note that there is no reference to improving people's access to nature (be that linear routes or open space), this should be included as a key issue. In addition to sports pitches and open spaces being important for health and wellbeing; high quality open spaces can also deliver wider benefits for nature and climate change. Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate quantity and quality of open space to meet identified local needs as outlined in paragraph 98 of the NPPF. Natural England's work on Accessible Natural Greenspace Standard (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

SA Team's Response/Action Taken

A.69 Improving people's access to nature has been included in the 'Open spaces and recreation' sustainability issue.

Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Biodiversity

A.70 Natural England welcomes the acknowledgement that development should not only avoid harm to biodiversity but should also contribute to its 'improvement and connection', though we would advise using the terms 'restoration and enhancement' instead, along with appropriate reference to ecological networks and securing measurable net gains, in line with paragraph 179 of the National Planning Policy Framework.

SA Team's Response/Action Taken

A.71 The 'Biodiversity' sustainability issue has been updated as suggested.

Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Landscape

Comment

A.72 Natural England agrees that the protection and enhancement of the sensitive landscape setting of the City is a key issue for the Local Plan, and reiterates our advice that the preparation of the plan must be informed by robust Landscape evidence.

SA Team's Response/Action Taken

A.73 Noted. A separate landscape sensitivity study is being undertaken, and the findings of this will inform the SA.

Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Natural Resources and Pollution

Comment

A.74 Natural England agrees that avoiding the loss of best and most versatile agricultural land is a key issue for the Local Plan.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

A.75 Stoke Woods SSSI is identified as at risk from air pollution. One of the key issues for the Local Plan should be to avoid increasing the risk to the SSSI site, and other habitats that are sensitive to air pollution. The SSSI Impact Risk Zones on Magic provide further information on the types and proximity of development that are likely to affect the site. The air quality effects of the Plan should be assessed in accordance with Natural England's guidance.

A.76 One of the key issues for the Local Plan should also be to maintain good water quality across the Plan area, and to avoid further deteriorations in water quality where the quality is poor.

SA Team's Response/Action Taken

A.77 Noted.

A.78 These effects will be assessed for Stoke Woods SSSI as part of the site options appraisals, using our site appraisal assumptions that will identify the potential effects from proposed development on biodiversity, such as air quality.

Chapter 5: Sustainability Appraisal Framework

Comment

A.79 SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change – This objective could include a sub-objective which asks 'will the policy/option support/enable the mitigation and/or adaptation measures needed to address the climate change impacts on the natural environment'.

SA Team's Response/Action Taken

A.80 The recommended sub-objective has been included.

Comment

A.81 SA Objective 4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities – The third sub-objective should specifically assess, given its known value in improving health and wellbeing, whether the policy/option promotes health and wellbeing by connecting people with nature.

SA Team's Response/Action Taken

A.82 The third sub-objective has been updated as suggested.

Comment

A.83 SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives – This objective should include a sub-objective that asks 'will the policy/option protect and enhance public rights of way and access, including the England Coast Path and National Trails'.

SA Team's Response/Action Taken

A.84 This is considered by SA Objective 4, sub-objective 3: Will the policy/option promote health and wellbeing by providing access to and maintaining, enhancing, connecting and creating multifunctional open spaces, green/blue infrastructure, recreation and sports facilities?

Comment

A.85 SA Objective 10: To conserve and enhance biodiversity and geodiversity – For clarity, the Sustainability Appraisal could define which ‘ecological assets’ the first sub-objective is referring to. For example, the plan should protect ancient woodland and other irreplaceable habitats, and it should protect and promote the recovery of priority species and habitats.

SA Team’s Response/Action Taken

A.86 These ecological assets are defined in the site assessment assumptions.

Comment

A.87 SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape – Natural England welcomes the commitment in this objective to test whether the plan will protect and enhance the locally valued landscapes, and the character and beauty of the wider countryside.

SA Team’s Response/Action Taken

A.88 Noted.

Comment

A.89 SA Objective 14: To support efficient use of resources, including land, minerals and waste – To avoid ambiguity, the second sub-objective could refer to ‘Best and Most Versatile’ agricultural land rather than ‘higher quality’, though we do support the intention to assess whether the plan avoids development on this valuable resource.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

A.90 This objective could also include a sub-objective that asks ‘will the policy/option protect or provide for the sustainable management of soils’.

SA Team’s Response/Action Taken

A.91 The suggestion of referring to ‘Best and Most Versatile’ agricultural land is noted and understood. ‘Higher quality agricultural land’ is used instead as the site assessment assumptions include criteria that score sites effects in relation to the Grade of agricultural land classification. Thereby sites located on higher quality agricultural land scoring more negatively.

A.92 The sub-objectives already included are believed provide appropriate consideration of the impact and management of soils.

Consultation comments received in relation to Outline Draft Local Plan

Natural England

Comment

A.93 In accordance with the paragraph 175 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA / SEA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land, and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

SA Team's Response/Action Taken

A.94 The Site Assessment Criteria (see Appendix D) that have been used in the appraisal of the site options ensure that consideration is given to whether site options fall within valuable landscapes, designated sites and high quality agricultural land and that the SA reflects the likely effects that development will have on these soils and landscapes. The appraisal of site options took place prior to the Council deciding which sites to include as allocations in the Draft Plan. The Council's reasons for deciding which sites to allocate are reported in Appendix E.

Comment

A.95 Tables 4.1, 5.1, 5.2, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.10, 6.11, 6.12, 6.13, 6.14, and 6.15 – The Sustainability Appraisal should include the full site assessment tables, setting out the commentary and reasoning against each sustainability objective for each policy, proposal and site allocation.

SA Team's Response/Action Taken

A.96 Annex 1 to this SA Report contains the full site proformas which provide details of each site and its likely effect on each SA Objective with reasoning. The SA findings for the policies in the Full Draft Plan are set out in Chapter 6, with tables showing the likely effects of each Policy (including site allocation policies) on each SA objective. The accompanying text explains the likely effects identified.

Comment

A.97 Paragraph 5.17 – Where a site allocation is progressed and is likely to affect a wildlife site, habitat or species the Sustainability Appraisal should recommend that the policy/proposal should set out the required mitigation

Appendix A Consultation Comments Received in Relation to Previous SA Documents

measures or, as a last resort, compensatory measures to be secured to address those adverse impacts. The LPA should have reasonable confidence that evidence is available to demonstrate mitigation will be possible and adequate to address impacts. If adverse effects cannot be overcome at a particular proposed allocation site, we would advise deletion of that allocation.

SA Team's Response/Action Taken

A.98 This SA Report makes any necessary recommendations in relation to policies which Exeter City Council can consider to reduce the possibility of negative effects on wildlife sites, habitats or species.

A.99 The separate HRA will set out recommendations for mitigation to be included within policies in the Full Draft Plan if any proposed development is likely to have an impact on the integrity of a European designated site.

Comment

A.100 SA Objective 9 (page 39) – In addition to affecting human health, poor air quality can also affect the natural environment. The UK Air Pollution Information System (APIS) provides data and information on pollutants and their impacts on habitats (incl. SACs, SPAs and SSSIs) and species. The SEA should be informed by the assessment of the impacts of air quality on Habitats sites that is being undertaken as part of the Habitats Regulations Assessment process.

SA Team's Response/Action Taken

A.101 Noted. The findings of the separate HRA were not available at the time of producing this SA. However, where available, the findings of the separate HRA will be taken into consideration within future iterations of this SA.

Comment

A.102 Paragraph 6.267 – Natural England is concerned that the cumulative loss of best and most versatile agricultural land has not been adequately assessed or justified.

SA Team's Response/Action Taken

A.103 Given that the majority of land within Exeter City is classed as being in urban use, the majority of development resulting from the Exeter Plan is expected to avoid the best and most versatile agricultural land. The assessment of cumulative effects in Chapter 6 of this report recognises under SA objective 14 that a small number of the allocated sites are predominantly greenfield and located on best and most versatile agricultural land, with likely adverse cumulative effects on soils.

Comment

A.104 Table A.1 in Appendix A – Natural England commented at the SA Scoping Report stage that the reference to 'ecological assets' in SA Objective 10 should be defined. The response to that comment, set out in this table, states that the ecological assets are defined in the site assessment assumptions. Are the site assessment assumptions those shown in Appendix D? If so, the ecological assets are only defined as international, national, or local designated conservation sites. The effects of the Plan on ancient woodland, other irreplaceable habitats, priority species and habitats, and components of ecological networks (for example) could also be appraised through the SA.

SA Team's Response/Action Taken

A.105 Reference to ancient woodlands has been added to the site assessment criteria in Appendix D under SA Objective 10: To conserve and enhance biodiversity and geodiversity. There are areas of ancient woodland to the north of Exeter City. Only two site options (Site ID. 134 and Site ID. 143) lie within 1km of ancient woodland and the effects identified for both sites reflect the distance the sites lie from this feature. The strategic nature of the SA means that the assessment is based on designated sites and features and assets for which GIS data is available.

Natural England Homes

Comment

A.106 The Sustainability Appraisal (informed by the HELAA, the Brownfield Sites Study, the Urban Capacity Study, the Landscape Sensitivity Assessment, the Habitats Regulations Assessment, a Green Infrastructure Strategy/Study, and a soil assessment) will need to demonstrate evidence that the housing site allocations have been subject to an assessment of their suitability for development, and sustainability, and that the preferred sites represent the option that allocates land with the least environmental value, and that reasonable alternatives have been considered.

SA Team's Response/Action Taken

A.107 This SA report demonstrates that reasonable alternative site options have been considered, and that the options have been appraised on a consistent basis taking into account the available evidence. The Council's reasons for selecting or rejecting site options are provided in Appendix E.

Historic England

Comment

A.108 Historic England has considered the Sustainability Appraisal Report (2022). Our previous comments on the SA Scoping Report in May 2022 covered baseline information, key issues and the SA Framework from a cultural heritage perspective. We noted that site-specific assessment criteria were still be developed and we also highlighted the need for the SA to be informed by an up-to-date historic environment evidence base, bearing in mind paragraphs 31, 32 and 35 of the NPPF 2021. We are pleased to see that many of our previous comments have been addressed in this Report.

SA Team's Response/Action Taken

A.109 Noted.

Comment

A.110 Historic England generally concurs with the findings in chapter 4 in relation to SA Objectives 11 and 12. However, in our view Option A would be more likely to give rise to significant negative but uncertain effects for SA Objective 12, given the density of heritage assets and presence of the Area of Archaeological Importance within the city centre.

SA Team's Response/Action Taken

A.111 Noted. As part of the SA of the Full Draft Plan, we have undertaken a review of the options appraisal. Given the high density of heritage assets, particularly Listed Buildings, within Exeter City Centre and advice from Historic

Appendix A Consultation Comments Received in Relation to Previous SA Documents

England we have changed the score from minor negative with uncertainty to significant negative with uncertainty against SA Objective 12: Cultural heritage.

Comment

A.112 We have also recommended other measures, such as the use of masterplans and criteria in policies, as ways in which significant adverse impacts on the historic environment can be avoided, minimised or mitigated, and opportunities for enhancements maximised, as part of the Plan's overall positive strategy for the conservation, enhancement and enjoyment of Exeter's irreplaceable historic environment (see NPPF 2021, paragraphs 189 and 190).

SA Team's Response/Action Taken

A.113 Noted. This relates more to the content of the Plan than the SA.

Comment

A.114 In respect of the site options appraisal in chapter 5, we note that all site options have been assessed as having negative (mostly significant and some minor) and uncertain effects for SA objective 12. As these ratings are based on proximity to heritage assets (see paragraph 6.258 and paragraph D.30 in Appendix D), they may be unduly negative in some cases. Many of the city centre sites are ripe for heritage led regeneration, which if well designed, could have a positive effect on Exeter's historic environment and townscape. This can be seen from our detailed comments in Appendix B to this letter, we are generally supportive of a number of proposed allocations subject an appropriate historic environment evidence and/or allocation policy criteria. We note that 'additional heritage site considerations' will be taken into account when available from paragraph 5.19 in chapter 5 in a later version of the SA Report, which we consider to be essential.

SA Team's Response/Action Taken

A.115 Noted. A distance-based approach has continued to be used in appraising the site options against SA Objective 12. This is due to the lack of heritage assessment work available at this time to inform the SA.

Comment

A.116 We do not wish to comment on the detail of the appraisal of the policies in the Outline Draft Plan and cumulative effects in chapter 6, nor the conclusions in chapter 8, with the exception of paragraphs 6.259 and 8.3. We disagree with the SA Report that development management policies in the new Local Plan (notably Policy HH1) can be relied upon alone to mitigate any negative and uncertain effects on the historic environment resulting from the Plan's spatial strategy, policies and allocations. There are related comments in the SA Report in paragraphs 4.10 and 5.19.

SA Team's Response/Action Taken

A.117 Policy HH1: Conserving and Enhancing Exeter's Heritage Assets (Strategic Policy), Policy HH2: Archaeology, HH3: Conservation Areas, HH4: Heritage Assets and Climate Change and Policy HH5: Conserving and enhancing Exeter City Walls will help protect and where possible enhance historical assets within Exeter. However, these policies will not solely be relied upon to ensure the protection of the historic environment. In addition, any mitigation in relation to the historic environment proposed through the site allocation policies in the Full Draft Plan will be considered to help mitigate any negative impacts as a result of development. More detail will also be provided for certain larger sites in the form of design codes and other guidance.

A.118 Any sites taken forward through the site allocation policies will be appraised with proposed mitigation within the policy taken into consideration.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

This could result in positive effects where enhancement and contributions to heritage assets within Exeter is proposed through the policy.

Comment

A.119 Further upfront work is needed to provide an adequate, historic environment evidence base that can inform both the SA and the new Local Plan, as per paragraphs 31, 32 and 35 of the NPPF 2021. This preventive measure would help remove the uncertainty from the many of the appraisals related to SA Objective 12, especially for the site options/allocations.

SA Team's Response/Action Taken

A.120 The SA takes into consideration and will draw on any available historic environment evidence base that is available at the time. In future iterations of the SA Report, the historic environment evidence base will be reviewed to ensure that the most recent information available is used.

Comment

A.121 Historic England has considered the monitoring proposals in Chapter 7, noting that these will be revisited as the Plan progresses. We are pleased to see indicators included for SA Objectives 11 and 12. Another potential indicator would be the amount of new development approved that causes harm to or loss of significance to heritage assets with the data source being planning application checks. There is further advice on effective monitoring in HEAN 8: Sustainability Appraisal and Strategic Environmental Assessment (2016).

SA Team's Response/Action Taken

A.122 An additional indicator has been included under SA Objective 12 within the monitoring framework in relation to the level of development that causes potential harm to or loss of significance to a heritage asset.

The Topsham 20 Campaign

Newcourt Road, Topsham (Site ID. 91, 92, 93 and 94)

Comment

A.123 Serious concerns about the compatibility of the Newcourt sites with the strategy.

A.124 However, the Topsham 20 Campaign has serious concerns about the Council's assessment of the suitability of the proposed development sites on Newcourt Road taking account of these principles.

A.125 Newcourt Road is a quiet lane bounded to the east by the railway line. It is a cul-de-sac, with no vehicular access beyond its northern end.

A.126 As a result, all motorised traffic to Newcourt Road is through Topsham, via Denver Road. From the proposed development sites, this entails a significant detour southward for any traffic bound for Exeter, Marsh Barton, Sowton or the M5. It will increase traffic not just along Newcourt Road and Denver Road (neither of which is suitable for significant increases in traffic volumes) but also:

Appendix A Consultation Comments Received in Relation to Previous SA Documents

- Along the main routes out of Topsham to Exeter, the M5 and Exmouth (Elm Grove Road, Clyst Road, High Street and Exeter Road);
- Into the centre of Topsham itself, as residents of the new developments seek to access shops, medical facilities, schools and other facilities. This will also increase parking pressure, which both traders and residents already consider to be a problem.

A.127 This traffic will also seriously compromise Newcourt Road as a viable route for cyclists and pedestrians. The lane is narrow and unlikely to be able to accommodate a pavement. It is often difficult or impossible for motorists to pass cyclists. There is unlikely to be space to improve these features, particularly at the Topsham end of Newcourt Road but probably also for most of the length.

A.128 The sites do not meet the criteria for a 10-minute community. They fail most of the tests set out in D.4 of the Site Assessment Criteria. In particular:

- All sites are more than 450m from a primary school and, as ECC recognises, parents are unlikely to walk long distances with young children.
- All sites are more than 900m walking from a secondary school.
- All sites are more than 720m from Topsham. Although site 91 is just within 720m from Spar at Newcourt, this cannot reasonably be considered as a “town” or “local centre”: there are no medical facilities, pharmacy, schools, cafes etc. Further, particularly at night the route to Newcourt is unlikely to be desirable or acceptable to most, as it is remote and crosses the M5.

A.129 Indeed, Newcourt is not listed in the draft Plan as a district centre or local centre (see paragraph 7.5 of the draft Plan).

- Most of the developments are in excess of 450m from Exeter Road and bus stops.

A.130 In light of all the above constraints, it is almost inevitable that residents at the proposed developments will seek to drive for a large proportion of journeys.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

This includes not just commuters travelling towards Exeter, but in all likelihood, those travelling to the Topsham community.

A.131 The construction of 125 new dwellings on the outskirts of Topsham will place inevitable strain on existing facilities. Of particular note, Topsham School is oversubscribed with single-form entry. As applicants are selected based on distance from the school, it is foreseeable that children at the proposed developments will not be allocated places. Parents may therefore have to travel (likely by car) to Countess Wear School or Clyst St George, increasing vehicular traffic (or resulting in the “bumping off” of other Topsham families, who will likewise need to transport their children to schools outside of Topsham by car).

SA Team’s Response/Action Taken

A.132 Noted. This comment relates to the Council’s decision-making, rather than the SA. The Council’s reasons for decision making in relation to the site allocations are set out in Appendix E.

SA Objective 8 – To reduce the need to travel by private vehicle and encourage sustainable and active alternatives

Comment

A.133 Regarding SA Objective 8, the Topsham 20 Campaign notes that Exeter City Council provisionally regards all the developments on Newcourt Road as likely to have a significant positive effect. This is on the basis that Exeter City Council proposes to use a criterion that scores any site within 1.8km of a railway station as likely to have a significant positive effect. It is notable also that this criterion is so broad that almost every site assessed by ECC is deemed, on this basis alone, to have a significant positive effect measured against objective 8.

A.134 The criterion is manifestly irrational.

A.135 First, it entirely ignores active travel, notwithstanding that STC1 and STC2 emphasise the importance of prioritising these modes of travel (see STC1 (1), (2) and (3) and STC2 (1a)-(1d), (2c) and (2d)).

A.136 Secondly, it prioritises rail travel over all other sustainable modes of transport. As a policy, it fails to take account of the fact that:

- Even when rail travel is available, most people travel by alternative means (including car).
- Rail travel is only a solution where the train travels to the traveller's desired destination (a serious consideration given that Exeter's rail network is not dense).
- The majority of travellers in Exeter are unlikely to travel by sustainable means for 1.8km from their home to take a train elsewhere within the Exeter area when there are alternative means of travel (including cars). This is particularly the case given that the distances within Exeter are relatively short: a commuter could travel to central Exeter by car significantly more quickly than the time taken to walk 1.8km to the station.
- Passengers will need to travel from the destination station to their ultimate destination, potentially significantly further increasing the journey distance to and from stations.
- It is entirely unclear on what basis Exeter City Council has determined that 1.8km is the appropriate distance. If it is by reference to commuter habits in Greater London or other major conurbations such as Birmingham and Manchester, this is entirely inappropriate given the differences between the demographics, geography, rail and road networks of Exeter compared with London and other major conurbations.

A.137 Additionally, in the case of the proposed Newcourt Road developments, the predominance of the proposed 1.8km criterion means Exeter City Council fails to take account of the significant local issues identified and the impact of the proposed Newcourt Road developments on traffic.

Appendix A Consultation Comments Received in Relation to Previous SA Documents

A.138 We note that ECC has assessed that each of sites 91-94 inclusive has potential to provide a great place to live with developments that could include measures to minimise car use and promote sustainable and active travel, including financial contributions to significantly improve pedestrian and cycle links to Newcourt and Topsham railways, a new pedestrian/cycle bridge and enhanced bus routes. We make the following observations:

- For the reasons set out elsewhere in our response, Newcourt Road offers a good, quiet way popular with cyclists and pedestrians. It is very unlikely that this can be “significantly improved” by developer contributions. Rather, as explained elsewhere, any development is likely to significantly degrade this route from the perspective of cyclists and pedestrians.
- For the reasons set out elsewhere in this response, these sites are unlikely to promote active travel. They will not form part of a “20 minute community” and residents will be highly car-dependent.
- A pedestrian/cycle bridge across the Avocet Line will be a “bridge to nowhere”: there are no facilities or other amenities to the east of the Avocet Line. This proposal is frankly poor-quality window-dressing by developers.

A.139 If these sites are to be designated for development, the Topsham 20 Campaign believes the only way to prevent significant additional car usage is for there to be a planning condition that these should be car-free developments in line with STC2 (final paragraph).

SA Team’s Response/Action Taken

A.140 The SA is a strategic level assessment and the actual use of sustainable transport modes will depend on people’s behaviour which can’t be assessed through the SA.

A.141 The criteria in relation to SA Objective 8 has been updated (see Appendix D) as set out below:

Appendix A Consultation Comments Received in Relation to Previous SA Documents

- Sites that are within 800m of a railway station and within 400m of a bus stop are likely to have a significant positive (++) effect.
- Sites that are within 800m of a railway station or within 400m of a bus stop are likely to have a minor positive (+) effect.
- Sites that are more than 800m from a railway station and more than 400m from a bus stop but which have a cycle path within 400m are likely to have a negligible (0) effect.
- Sites that are more than 800m from a railway station and more than 400m from a bus stop and cycle path could have a minor negative (-) effect.

A.142 The distance of 1.8km from a train station and 450m from a bus stop has been reduced to 800m and 400m respectively to help differentiate between site options which will help better identify the most sustainable site options in terms of proximity to public transport. The 800m and 400 distance to train station and bus stop is in line with the 1999 IHT Guidelines for planning for public transport in developments. Although the guidelines are old, they are widely used by Local Authorities . The site options have been re-appraised against SA Objective 8 with the outcomes of the SA appraisal detailed within Chapter 5.

A.143 In relation to active travel, the appraisal assumptions used in regard to distance to a transport mode/service/town centre are based on walking distances. Therefore, each SA Objective that uses distance-based criteria considers the use of active travel and how easily a service/transport mode/town centre is commutable by walking.

SA Objective 7 – To provide good access to services, facilities and education)

Comment

A.144 Regarding SA Objective 7: ECC has assessed sites 92 and 93 as having both minor negative effects and uncertain minor negative effects. By contrast for

Appendix A Consultation Comments Received in Relation to Previous SA Documents

sites 91 and 94 it has reached a different conclusion that the sites have minor positive effects and uncertain negative effects. This appears to be on the basis that ECC has concluded that sites 91 and 94 are located within 720m of a District Centre or Local Centre.

A.145 Site 91 is the most remote from Topsham at more than 1,000m on any possible measurement. It is technically closer to the Spar shop at Newcourt, but Newcourt is not (for good reason) regarded by Exeter City Council as a District Centre or Local Centre. Site 94 is around 900m from the closest shops in Topsham (and more than 1,000m from Newcourt); whilst it is closer to the boundary of Topsham, this is irrelevant since the boundary has no facilities. These distances will significantly increase the likelihood that residents drive, either to the centre of Topsham or through Topsham to alternative facilities.

A.146 Exeter City Council's assessment of sites 91 and 94 against SA7 is wrong.

SA Team's Response/Action Taken

A.147 The appraisal of site allocation Site ID. 91 has not concluded that the site is within 720m of a District Centre or Local Centre. The minor positive effect against SA Objective 7 relates to the distance of the site from a primary school. Site ID. 94 is, however, located within 720m of Topsham District Centre.

SA Objective 4 – Improve the physical and mental health and wellbeing of residents and reduce health inequalities

Comment

A.148 Regarding SA Objective 4, sites 91, 92 and 93 are considered in the draft Plan to have “minor positive effects”, apparently on the basis that ECC considers they are within 720m of either a healthcare facility or an area of open space/sports facility. As none of these sites is within 720m of a healthcare facility, it appears that ECC has determined that they are within 720m of an open space/sports facility.

A.149 This assessment is flawed: it is possible that ECC has considered that Topsham Rugby Club and the University Cricket Ground qualify as open space and sports facilities, but neither of these is public land and neither is therefore suited to the needs of the majority of residents (particularly those who do not play cricket or rugby/are not University students). As a result, it is likely that residents will travel further afield (for example to the recreational ground in Topsham) or to Exeter for formal sporting facilities. This will significantly increase vehicular traffic.

SA Team’s Response/Action Taken

A.150 Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks.

A.151 Site ID 91 and Site ID 94 are both located within 720m of the University of Exeter Topsham Sports Ground, Topsham Cricket Club and Topsham Rugby and Football Club. However, it is acknowledged that these areas of open space are not accessible to the general public. Therefore, a manual review of the

Appendix A Consultation Comments Received in Relation to Previous SA Documents

distance of site options from areas of accessible open space was undertaken. This has determined that Site ID 91 is located 444m from Omaha Drive Play Area and Site ID 94 is located 630m from Topsham Recreation Ground. Therefore, these sites are both located within 720m of accessible open space and no update to the sites' effects on SA Objective 4 are required. Both sites are also located near Public Rights of Way and/or the National Cycle Network. The review undertaken in relation to distance to open space found that Site IDs 92 and 93 are not located within 720m of accessible open space and therefore their effects have been updated within Chapter 5. Site ID 92 and 93 are both now likely to have minor negative effects against SA Objective 4.

Mitigation

Comment

A.152 The Topsham 20 Campaign notes that IC1 (delivery of infrastructure) recognises developer contributions should be sought through CIL and s106 to ensure necessary physical, social, economic and green infrastructure is in place to deliver the development.

A.153 For the reasons set out in this response, it does not consider further development in Newcourt Road should be permitted as it does not meet the objectives set by ECC.

A.154 However, in the event that development is permitted on Newcourt Road, we believe there should be provision in any consents to mitigate the adverse increases in traffic in and through Topsham by way of s106 contribution.

A.155 In particular this must include:

- Robust traffic calming across the through-routes. Such calming would reduce speeds. It would also tend to discourage rat-running from Exmouth Road to Countess Wear roundabout. Reducing through-traffic in

Appendix A Consultation Comments Received in Relation to Previous SA Documents

Topsham's main roads would materially contribute to off-setting the increase in road traffic caused by the developments.

- Robust measures to ensure that Newcourt Road remains desirable for pedestrians and cyclists, and that motorised traffic does not dominate. This is vital, since the proposed new dwellings are at best physically marginal to the local communities and residents will therefore be encouraged to use active travel only if they find this safe, pleasant and enjoyable.
- The Topsham 20 Campaign is concerned to ensure that each development contributes meaningfully to these measures. It notes that each proposed development on Newcourt Road is for between 13-43 dwellings but that the cumulative effect of these developments will be significant. Each must therefore be required to make a significant contribution.

SA Team's Response/Action Taken

A.156 This comment relates to the Council's decision-making, rather than the SA. The Council's reasons for decision making in relation to the site allocations are set out in Appendix E.

Consultation responses received in relation to the Full Draft Plan SA Report

Natural England

Sustainability Appraisal Report - Site Allocations

Comment

A.157 We understand that some of the site allocations may have been previously allocated in the Exeter Core Strategy – this should be highlighted in the Sustainability Assessment to inform the reader, especially if the sites are not undergoing current/further assessment. Whether there is a need for further assessment of these sites (including for cumulative impacts) should be considered.

A.158 Where the HELAA identifies that a site triggers a SSSI Impact Risk Zone (IRZ), it will be necessary to assess (through the SA/SEA) whether there is a potential impact pathway between the development and the site, and if there is, identify the likelihood of being able to mitigate those impacts and recommend the measures necessary. The Local Plan policy/proposal will then need to secure those necessary measures. Natural England is unable to confirm whether this process has been followed for all allocated sites (residential and employment) because the detailed SA assessment tables in Annex 1 only recognise distance to protected sites, and the SA findings only discuss the 6 strategic sites at this stage.

A.159 When further allocation policies are included in the next iteration of the Plan, it is expected that the SA will be updated to discuss these more thoroughly, including mitigation recommendations for development on B&MV soils.

SA Team's Response/Action Taken

A.160 Some sites previously allocated in the Exeter Core Strategy have been considered as potential allocations for the new Local Plan, alongside the other reasonable alternative options. However, all of the site options, including sites previously allocated, have been appraised in the same way. The previous allocation of these sites in the Core Strategy does not influence their treatment or performance in the SA.

A.161 The following text has been included at the start of Chapter 5 in the current version of the SA Report to explain this:

A.162 'Some sites previously allocated in the Exeter Core Strategy have been considered as potential allocations for the new Local Plan, alongside the other reasonable alternative options. The SA methodology for all sites has been the same, and the previous allocation of these sites in the Core Strategy does not influence their performance in the SA.'

A.163 The HRA of the Exeter Plan will consider the potential impact pathways between the site allocations and the European Sites and also identify any mitigation where required. If the HRA is available at the time of undertaking the SA appraisal at Regulation 19 Stage, the findings of the HRA will inform the SA appraisal.

A.164 Engagement with Natural England's National Planning Delivery Team in July 2024 has led to the conclusion that the SSSI IRZs dataset is not appropriate for use in SA. The dataset has been designed for use at the planning application stage and on a site-by-site basis, rather than for strategic-level assessment such as SA. In any case, recent updates to the dataset have rendered it unsuitable for use in this type of GIS analysis as it no longer includes data attributes in the shapefiles (instead loading a webpage where relevant criteria are listed).

A.165 The effects identified against SA Objective 10: Biodiversity and geodiversity for each of the potential sites will be taken into account by the Council along with other factors when deciding whether the site is taken forward and allocated. Where a policy or site policy could result in a significant negative effect against SA Objective 10: Biodiversity and Geodiversity, recommendations have been made to mitigate these negative effects where mitigation is not already included within the policy.

Water Lane – Reference 15 (Strategic Policy)

Comment

A.166 We would expect that this discussion would mention the potential for a direct pollution pathway into the Exe Estuary SPA, due to the location of the site. This site includes areas of Priority Habitat (coastal and floodplain grazing marsh) and Open Mosaic Habitat. These should be discussed with any recommendations for mitigation required.

SA Team's Response/Action Taken

A.167 The Water Lane – Reference 15 policy included wording to ensure no adverse effect on European Sites with mitigation contributions required in line with the South-east Devon Joint Habitat Mitigation Strategy. The policy also includes a requirement for biodiversity enhancements and mitigation of impacts on priority habitats.

A.168 The potential impact pathways as a result of the development of the site at Water Lane will be considered through the HRA of the Exeter Plan. The conclusions of the HRA have been taken into consideration in the overall cumulative effects for SA Objective 10: Biodiversity and Geodiversity.

A.169 At Regulation 19 stage, further recommendations for mitigation have been considered.

SA Objective 10: To conserve and enhance biodiversity and geodiversity

Comment

A.170 Natural England agrees that negative effects on biodiversity, geodiversity and landscape are currently uncertain as these will depend on factors such as design of the development. However, if specific mitigation is required to gain further certainty, this should be included as recommendations for policy text. The LPA should have reasonable confidence that evidence is available to demonstrate mitigation will be possible and adequate to address impacts on ecological assets.

SA Team's Response/Action Taken

A.171 Noted. Following the SA, recommendations have been included within the SA Report detailing improvements and clarifications to policies that may help to mitigate negative effects. At Regulation 19 Stage, further recommendations to the policies within the Exeter Plan have been made where required.

Flood Risk and Coastal Change

Comment

A.172 We would welcome discussion of the approach to coastal management within the Plan area, as set out in the Durlston Head to Rame Head SMP2 and

the sources of baseline data already identified in the Sustainability Appraisal Report.

SA Team's Response/Action Taken

A.173 Noted.

Historic England

Comment

A.174 While we do not wish to comment on the Sustainability Appraisal in detail, we note that the methodology used for SA Objective 12 (to conserve and enhance the historic environment including the setting of heritage) has used a purely distance based approach 'due to the lack of heritage assessment available'. This highlights a key gap in the evidence base informing this local plan. Unfortunately, the site appraisals contained in Annex 1 therefore do not follow the advice contained in our guidance on Strategic Environmental Assessment and Sustainability Appraisal. These appraisals say nothing about which assets may be affected, their significance, the nature of potential impacts or how these impacts could be mitigated. We believe that there are a number of sites which, if delivered well, could result in positive effects on the historic environment. We therefore hope that the Regulation 19 version of the Local Plan will secure this through appropriate policy and evidence and a robust Sustainability Appraisal in relation to the historic environment. Historic England recommends proportionate HIA of potential site allocations following the 5 step process contained in our Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans. This can be used to assess the likely heritage impacts of proposals and to advise on design parameters and policy criteria to minimise or mitigate impacts and secure enhancements. However, in relation to key strategic sites which already benefit from a number of policy criteria (e.g. in relation to archaeology and the settings of heritage assets), it may be sufficient for the Council to prepare a strategic evidence base

Appendix A Consultation Comments Received in Relation to Previous SA Documents

relating to key views and settings in order to inform specific design parameters such as protected views and/or appropriate building heights. This could then inform policy criteria in the plan as well as subsequent development proposals and planning decisions.

SA Team's Response/Action Taken

A.175 Historic England's recommendations on the approach to heritage assessment as part of the SA of site options are noted. The Council has prepared a Heritage Impact Assessment which includes impact assessment of the site options in relation to historic environment and assets. The findings of this Heritage Impact Assessment have been used as site assessment criteria in the appraisal of site options against SA Objective 12: Cultural Heritage.

Environment Agency

Comment

A.176 We have no significant comments to make regarding the Plan's performance against the sustainability appraisal objectives.

SA Team's Response/Action Taken

A.177 Noted.

Comment

A.178 It is important that the appraisal acknowledges the impact of additional development combined with climate change, upon the combined sewer network

and that ECC is content that the Plan adequately ensures mitigation of the effects of this impact upon water quality and consequently amenity, ecology and the economy.

SA Team's Response/Action Taken

A.179 The SA only appraises the policy wording and site options as well as reasonable alternatives. The policies within the Exeter Plan should be informed by the relevant evidence base to ensure that impacts on the combined sewer network, water quality, ecology and the economy as a result of development have been considered at the earliest opportunity. As part of the SA Report, recommendations have been made to mitigate any negative effects as a result of the policy.

A.180 Screening undertaken through the HRA will consider any impacts of development on water quality and the capacity of water infrastructure. The results of the HRA screening, where available, will be considered within the SA.

Comment

A.181 The sustainability appraisal acknowledges the conflicts associated with proposed housing allocations within proximity to flood zones 2 and 3 around the city. It is inevitable that housing allocations will present an overall negative effect when examined against SA Objective 13. It will be a matter for the council to determine housing allocation applications against relevant policy that aims to mitigate the effects of development in areas at risk of flooding to ensure the subsequent development can be considered sustainable. Alternatives on housing allocations are limited, with this in mind the need to ensure adequate mitigation techniques, along with water infrastructure financing and delivery become critical for successful implementation of the plan.

SA Team's Response/Action Taken

A.182 Noted. Following the SA, recommendations were included within the SA Report covering improvements and clarifications to policies that may help to mitigate negative effects of the Exeter Plan. At Regulation 19 stage, further recommendations to the policies have been made, where required.

No name

Comment

A.183 At 496 pages - this document is far too long to be properly commented upon in a survey of this type - also coming at the end when it has already taken upwards of 6 hours to go through the other policies is unfortunate. There should have been a notice that to read this would take several hours at the beginning of the survey process

SA Team's Response/Action Taken

A.184 A Non-technical Summary was prepared alongside the SA of the Exeter Plan. The Non-technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA appraisal findings. At the Regulation 19 Stage, an updated Non-technical Summary has been prepared and published alongside this full SA Report.

Comment

A.185 This is all far too wordy and absolutely exhausting to read. I'm afraid I gave up after the first half hour.

SA Team's Response/Action Taken

A.186 A Non-technical Summary was prepared alongside the SA of the Exeter Plan. The Non-technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA appraisal findings. At the Regulation 19 Stage, an updated Non-technical Summary has been prepared and published alongside this full SA Report.

Appendix B

Review of Relevant Plans, Policies and Programmes

International Plans and Programmes of Most Relevance for the Local Plan [See reference 25]

B.1 2022 Convention on Biological Diversity – COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

B.2 The Glasgow Pact (UN Framework Convention on Climate Change, 2021) – Nations adopted the Glasgow Climate Pact. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

B.3 Declaration on Forests and Land Use (COP26 Declaration) (2021) – International commitment to halt and reverse forest loss and land degradation by 2030, while delivering sustainable development and promoting an inclusive rural transformation.

B.4 The 2030 Agenda for Sustainable Development (2015) – Adopted by all United Nations Member States, provides a shared blueprint for peace and

prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

B.5 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998) – Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.6 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) – Sets the broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.7 European Environmental Noise Directive (2002) – Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

B.8 European Nitrates Directive (1991) – Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

B.9 European Urban Waste Water Directive (1991) – Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.

B.10 European Air Quality Framework Directive (1996) and Air Quality Directive (2008) – Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

Appendix B Review of Relevant Plans, Policies and Programmes

B.11 European Drinking Water Directive (1998) – Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

B.12 European Landfill Directive (1999) – Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

B.13 European Water Framework Directive (2000) – Protects inland surface waters, transitional waters, coastal waters and groundwater.

B.14 European Waste Framework Directive (2008) – Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

B.15 European Industrial Emission Directive (2010) – Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

B.16 European Floods Directive (2007) – A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

B.17 European Energy Performance of Buildings Directive (2010) – Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

Appendix B Review of Relevant Plans, Policies and Programmes

B.18 United Nations Paris Climate Change Agreement (2015) – International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.19 International Convention on Wetlands (Ramsar Convention) (1976) – International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.20 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) – Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.21 International Convention on Biological Diversity (1992) – International commitment to biodiversity conservation through national strategies and action plans.

B.22 European Habitats Directive (1992) – Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.23 European Birds Directive (2009) – Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.24 United Nations Declaration on Forests (New York Declaration) (2014) – Sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.25 United Nations (UNESCO) World Heritage Convention (1972) – Promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.26 European Convention for the Protection of the Architectural Heritage of Europe (1985) – Defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.27 European Landscape Convention (2002) – Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National Plans and Programmes (beyond the NPPF) of Most Relevance for the Local Plan

Climate Change Adaption and Mitigation

B.28 The Third National Adaptation Programme (NAP3) (2023) focuses on building climate resilience across key sectors in the UK. Its key aims include strengthening preparedness for climate risks, enhancing infrastructure resilience, protecting natural ecosystems, and integrating adaptation into planning and policies across government and society. It promotes a whole-society approach to adapt to climate risks like flooding and heatwaves. The Fourth strategy for Climate Adaptation Reporting, alongside NAP3 aims to increase accountability by requiring organisations to report on their

preparedness for climate impacts, focusing on critical infrastructure and supporting national climate goals.

B.29 The Biomass Strategy 2023 builds on the 2021 Biomass Policy statement and the Powering up Britain strategy which emphasised the important role that biomass will play in Britain's fully decarbonised power system by 2035, subject to security of supply. It sets out steps government intends to take to strengthen biomass sustainability and the opportunities for the use of sustainable biomass across multiple sectors of the economy in support of achieving the UK's net zero target.

B.30 The government aims to focus on implementing a cross-sectoral common sustainability framework, which will be subject to consultation. It states it committed to monitoring the levels of biomass supply to ensure the UK can secure necessary levels for increased biomass use across the economy. It has also committed to ensuring that biomass supply – given its risks and uncertainties – is not hindered at any stage; however, biomass demand is expected to increase. The government also aims for a "priority use" of biomass based on guiding principles that address sustainability, air quality, the net-zero and circular economy, and resource efficiency. This encompasses the deployment of bioenergy with carbon capture and storage (BECCS), the engineered greenhouse-gas removal technology, which captures and stores CO₂ from biomass while producing low-carbon energy.

B.31 The Carbon Budget Delivery Plan (2023) – Explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- Wider matters in connection with carbon budgets;
- The contribution of these proposals and policies to sustainable development; and
- The impact the package has on sectors of the economy.

B.32 Powering up Britain (2023) – Sets out the department’s approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan.

B.33 The Environment Improvement Plan 2023 – The Environment Improvement Plan 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country.

B.34 UK Climate Change Risk Assessment 2022 – Outlines the UK government and devolved administrations’ position on the key climate change risks and opportunities that the UK faces today. The risk assessment considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

- Risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards;
- Risks to soil health from increased flooding and drought;
- Risks to natural carbon stores and sequestration from multiple hazards;
- Risks to crops, livestock and commercial trees from multiple climate hazards;
- Risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks;
- Risks to people and the economy from climate-related failure of the power system;
- Risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings; and
- Multiple risks to the UK from climate change impacts overseas.

B.35 The British Energy Security Strategy (2022) – Sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister’s ‘Ten point plan for a green industrial revolution’, and the ‘Net zero strategy’. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain’s electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – Aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas – A licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing – The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.36 The Net Zero Strategy: Build Back Greener (2021) – Sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero

targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste); and
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.37 The Environment Act 2021 – Sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency;
- A target on ambient PM2.5 concentrations;
- A target to halt the decline of nature by 2030;
- Environmental Improvement Plans, including interim targets;
- A cycle of environmental monitoring and reporting;
- Environmental Principles embedded in domestic policy making; and
- Office for Environmental Protection to uphold environmental law.

B.38 Environment Agency: The National Flood and Coastal Erosion Risk Management Strategy for England (2020) – Sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.

B.39 Department for Transport, Decarbonising Transport: Setting the Challenge (2020) – Sets out the strategic priorities for a new Transport Decarbonisation

Plan (TDP), to be published later in 2020, will set out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP will take a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.40 The 25 Year Environment Plan (2018) – Sets out policy priorities with respect to responding to climate change, are using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably: Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment: Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.41 Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018) – Sets out the strategy for adapting both to the climate change that is already evident, and that which we might see in the future.

B.42 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018) – Sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to

address the risks and make the most of the opportunities of a changing climate”.

- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides”.
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”.
- Local Government – “Local government plays a central in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate”.

B.43 UK Climate Change Risk Assessment 2017 (2017) – Sets out six priority areas needing urgent further action over the next five years. These include:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Health, well-being and productivity from high temperatures;
- Shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology;
- Natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Domestic and international food production and trade; and
- New and emerging pests and diseases and invasive non-native species affecting people, plants and animals.

B.44 HM Government, The Clean Growth Strategy (2017) – Sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to

meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

B.45 Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014) – Sets out a number of key planning objectives. It requires that local planning authorities help deliver sustainable development through measures including driving waste management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns; and providing a framework in which communities can take more responsibility for their own waste.

B.46 Defra, Waste Management Plan for England (2013) – Sets out the measures for England to work towards a zero waste economy.

B.47 The Energy Efficiency Strategy (2012) – Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.48 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) – Sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

B.49 The UK Renewable Energy Strategy (2009) – Describes out the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.

Health and Wellbeing

B.50 The Levelling-up and Regeneration Act, published by DLUHC in 2023 sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

B.51 The Green Infrastructure Framework (2023) – The Green Infrastructure Framework by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future.

B.52 The White Paper Levelling Up the United Kingdom (2022) – Sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.

Appendix B Review of Relevant Plans, Policies and Programmes

- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

B.53 A fairer private rented sector White Paper (2022) – Aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

B.54 National Design Guide (2021) – Sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.55 Build Back Better: Our Plan for Health and Social Care (2021) – Sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will

improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.56 Covid-19 mental health and wellbeing recovery action plan (2021) – Sets out the government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing, to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes, and to support services to meet the need for specialist support.

B.57 Using the planning system to promote healthy weight environments (2020), Addendum (2021) – Provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.58 The Charter for Social Housing Residents: Social Housing White Paper (2020) – Sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.59 Public Health England, PHE Strategy 2020-25 – Identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.60 Planning for the Future White Paper (2020) – Sets out a series of potential reforms to the English planning system, to deliver growth faster. The White Paper focuses on the following:

- Simplifying the role of Local Plans and the process of producing them;

Appendix B Review of Relevant Plans, Policies and Programmes

- Digitising plan-making and development management processes;
- Focus on design, sustainability and infrastructure delivery; and
- Nationally determined, binding housing requirements for local planning authorities to deliver through Local Plans.

B.61 Homes England Strategic Plan 2018 to 2023 (2018) – Sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.62 Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015) – To be read in conjunction with the NPPF, this policy document sets out the Government’s planning policy for Traveller sites to ensure fair and equal treatment for Travellers.

B.63 Planning Policy for Traveller Sites (2015) – Sets out the Government’s planning policy for traveller sites. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

B.64 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013) – Warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.65 Fair Society, Healthy Lives (2011) – Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence

that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

B.66 HM Government, Laying the foundations: a housing strategy for England (2011) – Aims to provide support to the delivery of new homes and to improve social mobility.

Environment (biodiversity/geodiversity, landscape and soils)

B.67 The Environment Improvement Plan 2023 – The Environment Improvement Plan for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the 25YEP set out 10 goals. We have used those 10 goals set out in the 25YEP as the basis for this document: setting out the progress made against all 10, the specific targets and commitments made in relation to each goal, and our plan to continue to deliver these targets and the overarching goals. The environmental goals are:

- Goal 1: Thriving plants and wildlife
- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides
- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity

- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

B.68 Working with nature (2022) – Discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England’s habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

B.69 Establishing the Best Available Techniques for the UK (UK BAT) (2022) – Sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

B.70 The Environment Act 2021 – Sets out the UK’s new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its ‘archaeological, architectural, artistic, cultural or historic interest’.

B.71 Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018) – Sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The gov.uk website notes that the 25 Year Plan sits alongside two other important government strategies: the Industrial Strategy and Clean Growth Strategy (the former summarised in the Economic growth section below, the latter under Climate Change above).

B.72 Defra, Biodiversity offsetting in England Green Paper (2013) – Sets out a framework for biodiversity offsetting. Offsets are conservation activities designed to compensate for residual losses.

B.73 Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) – Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

B.74 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) – Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

B.75 Defra, Safeguarding our Soils – A Strategy for England (2009) – Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

B.76 England Biodiversity Strategy Climate Change Adaptation Principles (2008) – Sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these.

Historic Environment

B.77 Historic England, Corporate Plan 2022-23 – Contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

B.78 The Heritage Alliance, Heritage 2020 – Sets out the historic environment sector's plan for its priorities between 2015 and 2020.

B.79 Historic England, The Setting of Heritage Assets (2017) – Sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

B.80 Historic England, Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 (2016) – Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment processes.

B.81 Historic England, The Historic Environment in Local Plans (2015) – Provides information on good practice to assist local authorities, planning and other consultants, owners, applicants, and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).

B.82 Historic England, The Historic Environment and Site Allocations in Local Plans – Offers advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as

setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

Water and Air

B.83 Managing Water Abstraction (2021) – Is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.84 National Chalk Streams Strategy (2021) – Was built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

B.85 Meeting our future water needs: a national framework for water resources (2020) – Set the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

- Leave the environment in a better state than we found it; and
- Improve the nation’s resilience to drought and minimise interruptions to all water users.

B.86 The national framework marks a step change in water resources planning. The 5 regional water resources groups will produce a set of co-ordinated, cross-sector plans. These plans will:

- Address the scale of challenges we face by identifying the options needed in their region to manage demand and increase supply; and
- Realise opportunities from water resources planning by working collaboratively.

B.87 The Waste (Circular Economy) (Amendment) Regulations (2020) – Amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes.

They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.88 Defra, Clean Air Strategy (2019) – Sets out the comprehensive action that is required from across all parts of government and society to meet goals relating to ensuring cleaner air. This is to be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.89 The Road to Zero (2018) – Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.90 Our Waste, Our Resources: A strategy for England (2018) – Aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.91 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) – Provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULESvs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation

Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.92 Defra, Water White Paper (2012) – Sets out the Government’s vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

B.93 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) – Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy’s objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term; and
- Provide benefits to health quality of life and the environment.

Economic Growth

B.94 The Growth Plan 2022 – Makes growth the government’s central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer’s “growth plan” contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

B.95 Build Back Better: Our Plan for Growth (2021) – Sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-

quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.96 Build Back Better: Our Plan for Growth (2021) – Sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.97 The Agricultural Transition Plan 2021 to 2024 – Aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g. grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

B.98 The Agriculture Act 2020 – Sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

B.99 Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021 – Brings together the Government’s plans for economic infrastructure over this five year period with those to support delivery of housing and social infrastructure.

B.100 LEP Network, LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) – Seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local

Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

B.101 UK Industrial Strategy: Building a Britain fit for the future (2018) – Lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

B.102 Industrial Strategy: building a Britain fit for the future (2017) – Sets out a long-term policy framework for how Britain will be built to be fit for the future in terms of creating successful, competitive and open economy. It is shaped around five ‘foundations of productivity’ – the essential attributes of every successful economy: Ideas (the world’s most innovative economy); People (good jobs and greater earning power for all); Infrastructure (a major upgrade to the UK’s infrastructure); Business Environment (the best place to start and grow a business); Places (prosperous communities across the UK).

B.103 National Infrastructure Delivery Plan 2016-2021 (2016) – Sets out the government’s plans for economic infrastructure over a five-year period with those to support delivery of housing and social infrastructure.

Transport

B.104 Future of Transport: supporting rural transport innovation (2023) shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding principles for the introduction of new technologies and services.

B.105 The Cycling and Walking Investment Strategy Report to Parliament (2022) – Sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government’s long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by

2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

B.106 Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) – Sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.107 Decarbonising Transport: Setting the Challenge (2020) – Sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.108 Transport Investment Strategy (2017) – Sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;

- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.109 Department for Transport, The Road to Zero (2018) – Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.110 Highways England Sustainable Development Strategy and Action Plan (2017) – This strategy is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

Sub-National Plans and Programmes of Most Relevance for the Local Plan

B.111 Devon Community First Strategy (2022-2027) – A five-year plan focusing on improving community services, health, and care, emphasising person-centred care, community capacity building, and integration across services.

B.112 Devon Partnership Gypsy and Traveller Accommodation Assessment 2015 Final Report – The purpose of the assessment is to quantify the accommodation and housing related support needs of Gypsies and Travellers (including Travelling Showpeople) in terms of residential and transit/emergency sites, and bricks and mortar accommodation for the period 2014/15-2034/35. A

new assessment is currently underway and its findings will set out the requirements future provision for gypsies and travellers.

B.113 Devon County Council Climate Change Strategy (August 2018) – Devon County Council published its first climate change strategy in 2005. The Climate Change Strategy and its action plan were revised in 2018. This updated strategy is to ensure Devon County Council continues to mitigate greenhouse gas emissions and improve its resilience to climate change to encourage others across Devon to continue their efforts.

B.114 Devon Local Flood Risk Management Strategy 2021-2027 – The document outlines the responsibilities of the Risk Management Authorities in Devon and how they are working in partnership to coordinate local flood risk management. This covers everything from engaging with communities and preparing for floods, responding to flood events, collaborating on flood risk studies and investing in flood improvements.

B.115 Healthy and Happy Communities, Devon's Joint Health and Wellbeing Strategy 2020-2025 (2019) – The strategy is guided by the principles in the King's Fund: Four Pillars of Population Health (2018) and World Health Organisation: The Minsk Declaration. This strategy sets priorities and overall direction for the Devon Health and Wellbeing Board and local health, care and wellbeing organisations. The strategy sets out 4 priorities which are:

- Create opportunities for all, inclusive economic growth, education and social mobility;
- Healthy, safe, strong and sustainable communities creating conditions for good health and wellbeing where we live, work and learn;
- Focus on mental health building good emotional health and wellbeing, happiness and resilience; and
- Maintain good health for all supporting people to stay as healthy as possible for as long as possible.

B.116 Resource and Waste Management Strategy for Devon and Torbay 2020-2030 – The new strategy document will present how the 10 councils responsible for waste collection or disposal in Devon, will continue to work with residents to try to reduce the amount of household waste created and continue to ensure that waste is managed in a sustainable and cost-efficient manner. The key objectives are:

- To manage Devon's and Torbay's waste in a sustainable and cost efficient manner;
- To minimise the waste we create;
- To reduce the impact of resource and waste management in Devon and Torbay on climate change by implementing the waste hierarchy and tailoring operations to reduce the waste carbon footprint; and
- To maximise the value of the resources we use and preserve the stock of material resources i.e. preserve natural capital and practice resource efficiency.

B.117 Devon Waste Plan 2011-2031 (2014) – The Devon Waste Plan provides the policy framework for decisions by Devon County Council on planning applications for waste management development over the period to 2031, and builds on the progress made since adoption of the previous Waste Local Plan in 2006. The below objectives have been set to guide delivery of the vision:

- Management of waste;
- Meeting our capacity needs;
- Climate change;
- Supporting Devon's communities and businesses;
- Conserving and enhancing Devon's environment; and
- Transportation of waste.

B.118 Devon County Council Transport Infrastructure Plan to 2030 (2017) – Devon County Council has an important role in developing transportation strategies to shape the future growth of the county. This Infrastructure Plan sets

out planned investment in transport infrastructure across Devon covering the period 2014 to 2030. It complements the Local Transport Plan 2011-2026 which sets out the transport strategy for the county and the detailed infrastructure delivery plans relating to district council Local Plan development. The key purpose of this document is to set out planned delivery of infrastructure to 2030, concentrating on those schemes that deliver economic growth. This plan will guide the focus and prioritisation of resources within the authority and provide longer term clarity on the county's transport infrastructure delivery.

B.119 Devon Minerals Plan 2011-2033 (2017) – The Devon Minerals Plan provides the Policy framework for decisions by Devon County Council on planning applications for mineral development over the period to 2033, together with decisions on non-mineral development by other planning authorities that may affect mineral resources. To guide delivery of the Devon Mineral Plan Vision, the following Objectives have been set:

- Safeguarding mineral resources and infrastructure;
- Industrial minerals;
- Aggregate minerals;
- Building stone; and
- Managing mineral development.

B.120 12th Devon Local Aggregate Assessment 2013-2022 (2023) – The National Planning Policy Framework requires the preparation of an annual Local Aggregate Assessment by mineral planning authorities working individually or jointly. This tenth edition provides updated information using data for the ten years period to the end of 2020.

B.121 Devon County Council Education Infrastructure Plan (revised) 2016-2033 – Devon County Council sits as the education authority. The overarching aims of the EIP are to provide:

- Parents with an understanding of the range of educational offers available to suit their needs;

Appendix B Review of Relevant Plans, Policies and Programmes

- Schools with a clear understanding of how decisions are reached about pupil planning, estate maintenance processes (where applicable) and capital investment and where they fit into the decision-making process;
- Local Planning Authorities and housing developers with an understanding of their role in supporting the future pattern of education provision best suited to changing demand;
- Reconfirmation of Devon's overall strategic role;
- The wider community with an understanding of how education provision will be delivered to support the development of Devon over the next 20 years; and
- National Government with evidence base that supports future investment in Devon's schools, in particular to support special needs.

B.122 Devon County Council Green Infrastructure Strategy – This informal strategy aims to help leaders of organisations, local planning authorities, developers and others to achieve consistent and joined-up thinking on green infrastructure across administrative boundaries. The nine guiding principles are:

- Planning for green infrastructure from the outset;
- Ensuring resilience in water and flood management;
- Protecting and enhancing biodiversity;
- Conserving, enhancing and strengthening links with Devon's landscape;
- Conserving and enhancing the historic environment;
- Enabling access, fitness and contact with nature;
- Securing local food supply;
- Responding to climate change; and
- Generating income and attracting investment.

Local

B.123 The Exeter Local Plan First Review 1995-2011 (Adopted March 2005) and Core Strategy (Adopted February 2012) – Are the current adopted development plans for Exeter City Council. These plans will be replaced by the new Local Plan which Exeter City Council is preparing. The Core Strategy sets out policies to guide future development and change in Exeter City for the period up to 2026. It is the main document in the Local Development Framework providing a broad strategy for the development of the city to which other documents relate. The Core Strategy includes:

- The vision and objectives for the city;
- A Spatial Strategy for the city;
- Strategic policies which are designed to meet the objectives and deliver the spatial strategy;
- Strategic allocations; and
- Key diagram.

B.124 Exeter City Council has prepared Supplementary Planning Documents (SPD's) where necessary to amplify policies in the Local Plan. SPDs are supporting documents for the Local Plan which add to or expand upon policies, but do not include site allocations. The following SPDs have been adopted and are a material consideration in determining planning applications:

- Affordable Housing SPD
- South-west Exeter Development brief SPD
- Archaeology and Development SPG
- Sustainable Transport SPD
- Householder's Guide to Extension Design SPD
- HMO (including Class C4 Uses) SPD and Article 4 Direction
- Planning Obligations SPD

Appendix B Review of Relevant Plans, Policies and Programmes

- Public Open Space SPD
- Rougemont Castle SPG
- Residential Design Guide SPD
- Science Park SPD
- Trees and Development SPD
- University SPG
- Canal basin masterplan
- University of Exeter Streatham Campus Masterplan Framework SPD
- Riverside and Ludwell Valley Parks Masterplan
- First Homes Planning Policy Statement

B.125 St James Neighbourhood Plan (Adopted July 2013) – St James sits to the north of Exeter City Centre. The Neighbourhood Plan has been prepared by members of the community to guide future changes to create a balanced and vibrant community. The Plan aims to address the challenges St James faces by defining projects to improve the area and by setting out policies to influence planning decisions. The most important aims include:

- Establish a clear vision for the ward that most people in the community support;
- Define a local hub for St James;
- Build on new planning rules to restrict HMO development and rebalance the community;
- Encourage those types of development that meet the needs of the community;
- Manage the impacts of traffic and encourage sustainable transport;
- Improve the natural and built environment of the ward; and
- Support and maintain community facilities and services within the ward.

B.126 Exeter Development Delivery Development Plan Document (DPD) (July 2015) – The Development Delivery Plan aimed to:

- Allocate land for new development;
- Designate land for protection or safeguarding and identify land where specific policies apply;
- Contain ‘development management’ policies that would be used to determine whether planning applications submitted to the Council should be granted permission; and
- Include a Proposals Map that would show allocations and designations.

B.127 The Development Delivery Plan reached the stage of the Publication Version (July 2015) but was not progressed any further.

B.128 Exeter Area and East Devon Growth Point Green Infrastructure Strategy – Phase II (December 2009) – This Strategy builds on the first study published in April 2009 (which established a vision and objectives for GI investment, opportunities, potential initiatives and delivery challenges – answering the ‘why?’ and ‘where?’ questions), and provides greater detail in respect of specific opportunities to shape Green Infrastructure investment and of the means by which the local planning system – through the LDF and site masterplans for example – and delivery agencies will together drive the successful execution of the Strategy. This complements the Study by answering the ‘how?’ and ‘when?’ questions. Four objectives are proposed:

- To increase biodiversity;
- To mitigate and adapt to climate change;
- To manage growth and promote economic development; and
- To improve the health and well-being of our local communities.

B.129 Exeter Fringes Landscape Sensitivity and Capacity Study (February 2007) – The objective of the study was to assess the capacity of the landscape around the fringes of Exeter to accommodate development and to identify those landscapes that should be protected from development, taking into account the

value those landscapes and their sensitivity to change. This study is now in the process of being replaced.

B.130 Exeter City Council Strategic Flood Risk Assessment (2008) – The Strategic Flood Risk Assessment has been prepared as required by government guidance. The main objectives are:

- To provide maps of the LPA area, Main Rivers, ordinary water courses and flood zones, across the local authority area;
- To assess the implications of climate change for flood risk at development sites within the City;
- To show areas at risk of flooding from sources other than the river and the sea;
- To show the location of any flood management measures, including both infrastructure and the coverage of flood warning systems;
- To state the locations where additional development may significantly increase flood risk elsewhere;
- To provide guidance on the preparation of FRAs for development sites within the City;
- To provide guidance on the applicability of different sustainable drainage systems (SuDS) techniques for managing surface water run-off for all new development; and
- A new Strategic Flood Risk Assessment will be prepared to support development of the new Local Plan.

B.131 Exeter City Strategic Flood Risk Assessment Level 2 (2014) – Includes specific assessments in areas of higher flood risk and provides links to other sources of flood risk modelling (new sources of which will emerge over time). The SFRA Level 2 reduces uncertainty by increasing the quality and quantity of data to allow the application of the Exception Test.

B.132 2024 Level 1 Strategic Flood Risk Assessment (SFRA): The Exeter City Council's Strategic Flood Risk Assessment (SFRA) Level 1 Report evaluates

flood risks within the area, offering data and analysis to guide development planning. The report assesses flood sources, historical events, and future projections, providing flood maps and risk zones. It emphasizes sustainable drainage and mitigation measures, aligning with the National Planning Policy Framework to ensure safe, resilient development while minimizing flood risks. This assessment supports local strategies for flood management and planning permissions in flood-prone areas.

B.133 Exeter Visitor Strategy 2012-2016 – The strategy aims to further develop the visitor economy in order to create and safeguard employment, through the promotion and development of existing and new visitor facilities, including the Royal Albert Memorial Museum focusing on the strengths of Exeter as a regional cultural centre. The intention is to increase employment and visitor expenditure by a minimum of 5% within the lifetime of the strategy. Implementation of the strategy is intended to bring many positive economic benefits to the City in sustaining and creating quality jobs within the tourism industry through both public and private sector investment, and increase the profile of Exeter as the regional capital of the South West. Actions from this Strategy will continue to raise the profile of the City and the surrounding area regionally and nationally.

B.134 Heart of the South West LEP Strategic Economic Plan 2014-2030 – The plan has three core aims:

- Creating the conditions for growth by infrastructure and services to underpin growth (transport infrastructure, broadband and mobile connectivity, skills infrastructure);
- Maximising productivity and employment by stimulating jobs and growth across the whole economy to benefit all sectors (including tourism, agriculture and food and drink); and
- Capitalising on the distinctive assets.

B.135 Heart of the South West LEP Local Industrial Strategy – The strategy identifies growth challenges and solutions relating to the region's productivity. The strategy includes a capital asset strategy and innovative methods for

financing and equity investment that are designed to deliver transformational change where past initiatives have struggled. Exeter is flagged for pioneering a new approach to 'sustainable finance' which involves a programme to leverage the City's existing assets base across its public sector institutions and, via a City Fund vehicle, obtain commercial borrowing to create a subsidy-free and commercial Citywide financing and development capability. Exploring and developing innovative funding vehicles such as this could provide the key to unlocking much of the infrastructure delivery requirements across the South West region.

B.136 Exeter and West End of East Devon Retail and Leisure Study 2016 –

The objectives of this study were as follows:

- A quantitative assessment of the need for new retail and leisure floorspace, taking into account market signals and special forms of trading;
- A qualitative assessment of existing retail provision, including a review of the health of City, district and local centres across the Exeter urban area;
- An assessment of whether there is scope to accommodate identified needs within existing centres or whether there is a need to adapt/enlarge centres to accommodate the identified needs in full;
- A review of the viability of planned town centre developments in Exeter City centre and Cranbrook; and
- An assessment of the impact of out-of-centre retail development on the health of, and investment within, existing 'town centres'.

B.137 Exeter Parks and Open Spaces Strategy (2005) – The overall vision for Exeter's Parks, Playing Fields and Open Spaces is to ensure Exeter's Parks, Playing Fields and Open Spaces are clean safe and sustainable, and meet the needs of all sections of the community to enjoy outdoor recreation. The aims of the strategy are to:

- Provide a clear policy for all functions within Open Space, to inform a management policy and future investment;

Appendix B Review of Relevant Plans, Policies and Programmes

- Provide an umbrella document to link other strategies such as allotments, trees, outdoor sports and play into an overall vision in accordance with the Biodiversity Plan;
- Strengthen the protection of open spaces and habitats;
- Contribute to the delivery of the corporate vision, aims and strategies e.g. the economic growth of the City as a Regional Capital by promoting the wider values of Open Space provision;
- Provide a platform for engagement with local groups and communities;
- Ensure open spaces meet the needs of users and potential users, particularly regarding access, to improve the quality of life for all Exeter's citizens;
- Provide measurable qualities and standards and improve and innovate services continuously;
- Link to other strategies to ensure conformity of approach and policy;
- Link to statutory planning processes – assisting with directing S106 funding; and
- Provide guidance for a business strategy for the Parks and Open spaces service.

B.138 The Parks and Open Spaces Strategy dates back to 2005 and is currently in the process of being updated with a new Parks and Greenspace Strategy.

B.139 Exeter City Council Audit of Outdoor Recreation Facilities (2005) – This is an audit of the outdoor recreation facilities available to serve Exeter. It was prepared in accordance with Government guidance as background information in support of the Exeter Local Plan First Review and the Open Space Supplementary Planning Document.

B.140 Exeter Playing Pitch Strategy 2022 – The strategy considered the supply and demand in relation to pitch sports. The strategy is accompanied by an

Action Plan, setting out the site specific actions for each sport and strategic and priority projects.

B.141 Exeter Five Year Housing Land Supply Statement (September 2024) –

This statement presents the current five year housing land supply position for Exeter City Council. It applies from May 2024 and sets out the housing supply position in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). It covers the five year period from 1st April 2024 to 31st March 2029.

B.142 Liveable Exeter – A Transformational Housing Delivery Programme

(February 2019) – Outlines the eight transformational projects that will help Exeter renew the structure of the City so that it can accommodate the sort of change and attract the investment it needs for its communities to proposed in the future.

B.143 Exeter Housing Strategy 2023-2027 – The key objectives are identified as:

- Enhancing Resident Experience
- Providing the Right Homes in the Right Places
- Providing Value for Money Services
- Supporting our residents
- Ensuring the Safety of our Homes and Residents

B.144 Exeter Housing Market Area Strategic Housing Market Assessment Final Report 2014/15 – Addresses housing issues and establishes Objectively Assessed Housing Needs in the local planning authority areas of East Devon, Exeter, Mid Devon and Teignbridge. On the basis of trend patterns and jobs-led population increases the SHMA work establishes housing requirements over the twenty year period from 2013 to 2033.

B.145 East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment (2022) – This assesses the nature and make-up of current and future housing needs in the city to 2040.

B.146 Local Housing Needs Assessment (LHNA) 2020 for the Greater Exeter Area – The LHNA sets out the size, type and tenure of housing needed for different groups in the community for the Greater Exeter area. Further information is also provided on needs related to student housing in a separate appendix document. The study is currently in the process of being updated with an Exeter-specific LHNA.

B.147 Exeter City Council Homelessness & Rough Sleeping Prevention Strategy 2023-2027 - The strategy document combines an overview of the outcomes from the previous homelessness strategy (Exeter City Council - 2016-2021) with a review of current and profiling homelessness need in Exeter. The strategy fundamentally proposes five priority work areas with the following key objectives:

- Ending Rough Sleeping – by end 2024
- Increasing Homelessness Prevention
- Progressing Health, Wellbeing & Recovery
- Growing Inclusion and Enablement
- Optimising Systems and Partnerships

B.148 Draft Exeter Contaminated Land Strategy 2022-2027 – The aims of the strategy are:

- To identify and remove unacceptable risks to human health and the environment;
- To seek to ensure that contaminated land is made suitable for its current use; and
- To ensure that the burdens faced by individuals, companies and society as a whole are proportionate, manageable and compatible with the principles of sustainable development.

B.149 Exeter City Council Air Quality Annual Status Report (2023) – The status report that is produced annually monitors air quality within the City. In Exeter in 2021 the fraction of mortality attributable to particulate air pollution was 5.0%. This is just below the regional figure for the south west (5.1%) and below the national level of 5.5%. Exeter therefore has levels of particulate matter which are causing harm, but this problem is less severe than in 75% the country.

B.150 Exeter Authority Monitoring Report 2022-2023 – This monitoring report covers the period 1st April 2022 to 31st March 2023 for Exeter City Council. The Localism Act 2011 requires local planning authorities to produce an Authority Monitoring Report, which provides statistics resulting from no more than a 12 month period. The intention of monitoring is to assess whether the strategy and policies of the local plan and other plans are delivering the intended outcomes.

B.151 Exeter City Futures Net Zero Exeter 2030 Plan – The Plan presents Exeter's view of how the City can achieve its ambition to be net-zero carbon by 2030. The mission is to bring Exeter's businesses, individuals, communities and leaders together and provide the coordination and focus needed to deliver the City's carbon ambitions. 12 Goals have been established that form the basis of the approach to the delivery of a Net Zero Exeter and can be grouped into four themes – Energy, Mobility, Sustainability and Capability. The Goals are:

- Reduced Energy Consumption;
- Access to Renewable Energy;
- Affordable Healthy Homes;
- Reliable Journeys & Resilient Roads;
- Reduced Dominance of Cars;
- Green Spaces and Local Produce;
- Clean Air;
- Efficient Resource Management;
- Regenerative Design;
- Collective Action;

Appendix B Review of Relevant Plans, Policies and Programmes

- An Analytical Approach; and
- Locally Controlled Finance.

B.152 Exeter Transport Strategy 2020-2030 (November 2020) – With a climate emergency declaration, advancements in technology and a better understanding of changing travel habits, the Local Transport Plan 3 (2011-2026) has been refreshed and replaced by the new Transport Strategy to better reflect current trends, carbon reduction priorities and the needs of communities. The strategy focuses on improving travel choices, creating better places for people and taking advantage of technology opportunities to influence travel behaviour in a positive way. The strategy embodies 3 key themes:

- Greater Connectivity focusing on travel into the City from outside Exeter's boundaries;
- Greater Places for People is about travel within and quality of life in the City; and
- Greater Innovation will see the Council looking to work with private sector partners to test and implement innovative technology solutions to make travel easier and help the City's transport networks operate more flexibly and efficiently.

B.153 2030 Net Zero Exeter Plan: The Net Zero Exeter 2030 Plan outlines strategies for Exeter to achieve carbon neutrality by 2030, emphasising sustainable transport, renewable energy, and biodiversity conservation. Key actions include promoting cycling and public transport, retrofitting buildings for energy efficiency, and fostering local renewable energy production. The plan also addresses waste reduction, climate adaptation, and community engagement to build resilience and support behavioural change across Exeter's population.

B.154 2023 Exeter's potential for wind and solar energy: The Exeter wind and solar potential report explores the city's renewable energy opportunities, examining ideal sites for wind and solar installations. It assesses specific locations, estimated capacities, and the environmental and logistical challenges involved. The document concludes that Exeter has substantial potential for local

energy generation through these technologies, though key regulatory and funding support is necessary to reach ambitious targets.

B.155 2023 Economic Development Needs Assessment (EDNA) Final Report: The Greater Exeter Energy Demand and Net Zero Assessment evaluates energy needs, carbon reduction targets, and pathways to achieving net-zero emissions across Greater Exeter. It examines current and projected energy demands, renewable energy options, and retrofitting requirements. Key recommendations include developing local renewable energy generation, improving energy efficiency in buildings, and fostering community engagement to reduce overall demand. The report emphasises coordinated policy action to meet environmental targets by 2050.

B.156 Landscape sensitivity assessment: The 2022 Landscape Sensitivity Assessment for Exeter evaluates the area's landscapes to inform sustainable development and conservation efforts. It identifies zones of varying sensitivity, considering ecological, aesthetic, and cultural factors, and assesses potential impacts of development on these landscapes. The report offers guidance for local planning, suggesting areas where development could proceed with minimal landscape impact and areas requiring preservation due to high sensitivity.

B.157 Greater Exeter Town Centre and Retail Study Part One and Part Two: Part one of the Retail Study examines the retail sector across various locations, focusing on retail needs, vacancy rates, and consumer spending habits, identifying demand gaps and recommendations for future growth in local shopping options and retail space planning.

B.158 Part two of the Retail Study builds on part one's analysis, delving deeper into changing consumer behaviours and retail market trends. It emphasises strategic planning in response to economic shifts, suggesting measures to adapt to the evolving landscape, including enhanced local retail offerings and adjustments to policy for sustaining economic vitality in the retail sector.

Surrounding Development Plans

B.159 East Devon Local Plan 2013 to 2031 (2016) – East of Exeter, to the southern edge of Devon, East Devon District Council has adopted in January 2016 the East Devon Local Plan 2013 to 2031 which makes provision for a minimum of 17,100 new homes within the plan period. The Plan also allocates 150 hectares for development for employment. East Devon's West End will be the focal point for job provision in the District with 21.4 hectares of employment land allocated as part of the Exeter and East Devon Growth Point. The overall spatial development approach is set out below:

- East Devon's West End will accommodate significant residential development and major employment development to attract strategic inward investment along with supporting infrastructure and community facilities;
- The seven main towns of East Devon will form focal points for development to serve their own needs and the needs of surrounding rural areas; and
- The Local Plan will set out how development in smaller towns, villages and rural areas will be geared to meeting local needs.

B.160 East Devon District Council is preparing a new Local Plan that is expected to ultimately replace the existing Local Plan, which covered the period 2013 to 2031, as well as replacing the Villages Plan and potentially, the Cranbrook Plan which is a major new East Devon market town. The new Local Plan will cover the period between 2020 to 2040 with the Draft Local Plan consulted on between November 2022 and January 2023. A further consultation was held between May and June 2024. The Draft Local Plan proposes to allocate a total of 18,167 new homes and increase the level of new employment floorspace. The Council are currently working towards Regulation 19 Publication Plan.

B.161 Mid Devon Local Plan 2013-2033 (2020) – North of Exeter, Mid Devon District Council adopted the Mid Devon Local Plan 2013-2033 on 29th July

2020 which makes provision for 7,860 dwellings that are required over the plan period to meet needs. The housing requirement is split across the following settlements: Tiverton (2,358), Cullompton (3,930), Crediton (786) and rural areas (786). The Plan sets a commercial development requirement of 147,000 sqm which is met through Local Plan allocations, distributed as follows: Tiverton (37,000sqm), Cullompton (57,000sqm), Crediton (9,820sqm), Junction 27 (42,550sqm) and rural areas (22,355sqm). The majority of the employment land allocations is already consented apart from land at Junction 27 of the M5.

B.162 Mid Devon District Council is working on the next Local Plan Review which will guide development in the District over a 20 year period. A Call for Sites was launched on the 8th February to the 22nd March 2021 which will help inform the next Local Plan and provide background evidence on the potential availability of sites. This provided individuals and organisations the opportunity to suggest to the Council sites that they think have the potential to be developed for housing, economic or other uses. Consultation on the Plan Mid Devon 2023-2043 Regulation 18 Issues Paper took place from the 31st January to the 28th March 2022 which sought views about what the new Local Plan will include. Mid Devon have a calculated housing need of 365 homes per annum using the standard method.

B.163 Teignbridge Local Plan 2013-2033 (2014) – South-west of Exeter, to the southern edge of Devon, Teignbridge District Council has adopted the Teignbridge Local Plan 2013-2033 in May 2014 supporting business, general industrial and storage and distribution development with the aim to create about 300 jobs per year in these sectors. A total of 80.2 hectares of employment land is available for development during the plan period. The approximate distribution of employment development between the towns over the period of the plan should be:

- Heart of Teignbridge (Kingskerswell, Kingsteignton, Newton Abbot) 60%+;
- South-west Exeter 5%+;
- Dawlish 3%+;
- Bovey Tracey 3%+; and
- Chudleigh 3%+.

B.164 The Strategic Housing Market Assessment updated in 2012 as part of the Plan preparation identified a need of 620 dwellings per year, which amounts to 12,400 over the plan period spread across the various settlements.

B.165 Consultation on the Draft Local Plan 2020-2040 (Part 3) Renewable Energy, Gypsy and Travellers and Residential Site Options has closed which ran from 15th November 2021 to 24th January 2022. The Draft Plan has identified 24 small site options (25-50 homes) that were subject to consultation. The Teignbridge Plan (2020-2040) has recently undergone Examination Hearings.

B.166 Exeter City, Mid Devon and East Devon Councils are currently preparing a joint strategy across the four local authority planning areas to address strategic matters. The strategy is titled Our Shared Coordinates and will be used to progress work on key strategic planning issues, such as climate change, and to focus funding and investment on infrastructure priorities including waste water and water supply, renewable energy projects, strategic healthcare, multi modal transport, and energy grid improvements.

Appendix C

Baseline Information

Population, Health and Wellbeing

Population

C.1 Exeter City lies within the county of Devon in the South West of England. It had an estimated population of around 137,050 in 2023, compared to 117,800 in 2011 (16.3% increase). This is higher than the overall increase for England over the same period (8.6%). The gender split is 69,974 females and 67,076 males. The largest age category (by five-year age group) within the population is 20-24 years (21,068 people), and second largest is 15 to 19 years (10,403 people) [\[See reference 26\]](#). This is influenced by the high student population – in 2021/22 it was estimated that there was a total of 27,276 students living in Exeter. The University expects the growth in student numbers to slow down over the coming years. Student growth is expected to be at a level of 800 students per annum [\[See reference 27\]](#).

C.2 Table C.1 below presents the most recent estimates of population by ward in Exeter as of 2021 [\[See reference 28\]](#).

Table C.1: Estimated populations by ward in Exeter City Council (2021)

Ward	Estimated Population (2021)
Alphington	8,300
Duryard and St James	15,100

Ward	Estimated Population (2021)
Exwick	9,800
Heavitree	9,200
Mincinglake and Whipton	8,800
Newtown and St Leonard's	10,900
Pennsylvania	10,500
Pinhoe	9,600
Priory	8,700
St David's	10,500
St Loyes	9,400
St Thomas	9,800
Topsham	10,000

Housing

Housing Delivery and Supply

C.3 The Core Strategy housing target of at least 12,000 dwellings between 2006 and 2026 has been superseded by the Government's standard method housing figure. The standard method uses a formula to assess housing need and identify the minimum number of homes expected to be planned for. It sets out a minimum annual housing need figure. Exeter's standard method housing figure is currently 642 homes per annum [\[See reference 29\]](#).

C.4 The following numbers of homes were completed in Exeter in the reporting year April 2022 to March 2023:

- 462 net additional homes (not including Purpose Built Student Accommodation); and

- 398 net additional Purpose Built Student Accommodation bed spaces.

C.5 Previous annual housing completions (excluding Purpose Built Student Accommodation) are outlined in Table C.2.

Table C.2: Annual housing completions in Exeter City

Reporting Year	Number of Dwellings Completed
2006/07	891
2007/08	491
2008/09	236
2009/10	270
2010/11	432
2011/12	555
2012/13	87
2013/14	382
2014/15	483
2015/16	618
2016/17	508
2017/18	473
2018/19	621
2019/20	553
2020/21	348
2021/22	585
2022/23	462

C.6 Table C.2 shows how housing completions in 2022/23 amount to 462 dwellings, which is similar to previous years but reflects the impact on the construction industry of COVID-19 and related national lockdowns. The figure from 2022/23 shows a fall in housing completions on the 2021/22, though a rise on the 2020/21 figures. Exeter's four year (2024/25 to 2026/27) housing requirement is 2,568 homes, as outlined in the Five Year Housing Supply Statement [\[See reference 30\]](#). The deliverable supply of housing identified in the next four years (2024/25 to 2027/28) is summarised in Table C.3 below and shows there is a total net supply of 3,243 homes excluding purpose built student accommodation. Therefore, against the four year housing requirement (2,568), the Council is currently able to demonstrate a supply (3,243) of just under five years and one month for the period commencing 1 April 2024. This figure excludes purpose built student accommodation.

C.7 Supporting Exeter's housing delivery is the Liveable Exeter [\[See reference 31\]](#) housing programme that aims to deliver 12,000 new homes in new urban communities on existing brownfield sites.

C.8 There were around 6,900 households with student Council Tax exemptions in March 2022. The majority were in halls and purpose-built accommodation, but 40% (2,742) were in private rental or HMO accommodation. This is helping to reduce the increase of student houses in multiple occupation (HMOs), to the extent that more students are now accommodated in PBSA than in the HMOs. However, the Core Strategy target to ensure that 75% of additional students in need of accommodation are housed in PBSA has still not been met, and there are risks that pressure could grow for additional student HMOs in the general housing stock. The wards where student accommodation is most concentrated are St James, St Davids, Newtown and Polsloe [\[See reference 32\]](#).

Table C.3: Total net housing supply 2024/25 to 2028/29

Type of Site	2024/25	2025/26	2026/27	2027/28	2028/29	Total (Net)
Major sites with consent/resolution to approve	553	1,108	536	559	188	2,945
Small sites with consent/resolution to approve	139	0	0	0	0	139
Identified sites without planning consent	0	0	0	0	0	0
Windfalls	0	22	41	48	48	159
Total net supply	693	1,130	577	607	236	3,243

C.9 A Housing Needs Assessment was undertaken in 2024 [\[See reference 33\]](#). The study found that approximately 1,769 households in Exeter City are living in unsuitable housing and are unable to afford their own housing as of 2021. It is expected that 1,862 additional households will require affordable housing in Exeter City between 2021-2041. The local housing need is calculated at 642 dwellings per annum which translates to 12,840 dwellings between 2021-2041. There will also be a significant need for homes meeting older person requirements with a 95% of the household growth projected to be aged over 65.

C.10 Much of the private rented housing sector is relatively poor quality. On the other hand, council housing stock is essentially sound but a number of properties need upgrading. The Council is in the process of delivering a programme to retrofit all of its homes to reduce carbon and lower fuel bills. Retrofitting involves homes receiving external wall insulation, high performance cavity wall insulation, loft insulation, new double glazed windows and doors, solar panels, smart meters and upgraded central heating systems. The Council aims to transform all of its properties in Exeter as part of its ambition to become a Net Zero Carbon City [\[See reference 34\]](#).

C.11 With reference to the indices of deprivation, living environment is one of the indicators and takes into account the condition of both indoor and outdoor environment. Overall, Devon has a slightly above average living environment, as does Exeter City although it performs less well than Devon overall.

Housing Affordability

C.12 The housing market in Exeter is expensive and residents struggle to afford homes. This is due to a number of reasons:

- As of July 2024, the average house price in the UK was £289,723, whereas the average house price in Exeter was £314,533 [\[See reference 35\]](#);
- Whilst housing supply is keeping up with targets, market signals indicate a current imbalance between supply and demand which results in a lack of availability/affordability;
- Much housing in the private sector, whether to buy or rent, is unaffordable;
- Options for social and affordable rents are reducing; and
- Average weekly earnings for Exeter residents are lower than the national average.

Homelessness

C.13 Within the South West as a whole, 6.40 households were assessed as homeless per 1000 between 2023-24. During the same period, 9.76 households in Exeter were assessed as homeless per 1000, which is above the South West figure [\[See reference 36\]](#). The Exeter Homelessness and Rough Sleeping Prevention Strategy 2023-2027 [\[See reference 37\]](#) states that despite its many successes, Exeter experiences significant challenges. High and increasing prices for buying or renting housing reflect the city's desirability as a leading place to live. A consequence of this is that the city's housing stock has become increasingly unaffordable for many local families especially those on below

average incomes. This is particularly putting pressure on the local rental market causing some residents to have to leave their homes due to affordability and over-crowding issues and / or notice from landlords. This is contributing to a rise in homelessness. The strategy outlines that the primary reason recorded for households needing homelessness advice and assistance over the past five years in Exeter is breakdown of a family household where the parent(s) or relatives are no longer willing to accommodate (21% of overall cases in 2021-22). The second most common reason is ending of a private rented tenancy (19%).

Health

C.14 Health is a cross-cutting topic and, as such, many topic areas explored in this SA Report influence health either directly or indirectly. The latest published health-related information comes from the 2011 Census which provides a snapshot of the general health and well-being of residents in Exeter at that time.

C.15 The health of residents of Exeter was described as 'Very Good' or 'Good' by 83.8% of the population compared to 82.2% for England. Only 4.6% of Exeter's population described their health as 'Bad' or 'Very Bad', compared to the figure of 5.2% for England [\[See reference 38\]](#).

C.16 The Devon County Council Public Health Annual Report (2023-24) focuses on preventing ill health and diseases. The strategy focuses on prevention at a primary, secondary and tertiary level. Primary prevention relates to reducing ill health that can attributed to lifestyle choices and behaviour. Secondary prevention relates to detecting the early stages of disease and tertiary prevention is about treating an individual who is in declining health.

Life Expectancy

C.17 Life expectancy at birth in 2022 in Exeter was 78.8 years for males and 84.0 years for females. The figures for Exeter are lower for males than the

regional value of 80.0 years but similar for females at 84.1 years. The gap in life expectancy at birth between the least and most deprived areas is 7.4 years for males and 5.4 years for females in Exeter. This is lower than average for England where the gap was recorded as 9.4 years for males and 7.6 years for females. This data is based on 2018 to 2020 data [\[See reference 39\]](#).

Obesity

C.18 Being overweight or obese carries numerous health risks, including increased likelihood of type 2 diabetes, cancer, heart and liver disease, stroke and related mental health conditions. It is estimated this health issue places a cost of at least £5.1 billion on the NHS and tens of billions on the wider UK society every year [\[See reference 40\]](#).

C.19 55.8% of adults were classified as overweight or obese in the period 2022/23 [\[See reference 41\]](#). This is lower than the regional value of 62.5% and England value of 64.0%. The value in Exeter has dropped from 59.8% since 2015/16. Within Exeter in Year 6 at school, 13.8% of children were classified as overweight (including obesity) in the period 2022/23. This figure has followed a decreasing trend since 2013/14, decreasing from 33.7% [\[See reference 42\]](#).

C.20 The number of hospital admissions with a primary diagnosis of obesity is not reported at local authority level. In 2019/20 Devon reported 10 persons per 100,000 finishing admissions episodes during this period. This figure is lower than the regional figure of 17 and the national figure of 20. The figure for Devon was split between males and females at five persons per 100,000 and 16 persons per 100,000 respectively [\[See reference 43\]](#).

Perception of Wellbeing

C.21 Residents of Exeter reported having slightly lower levels of life satisfaction (7.36 out of 10.00) than the average for UK 7.45 in the period 2022/23. This is a decline in life satisfaction compared to previous years. Average figures

recorded relating to 'feeling the things done in life are worthwhile' have increased to 8.10 in the period 2021/22 and are higher than the UK average of 7.73. Average figures recorded relating to 'happiness' are lower than the previous seven years (7.3.4) in the 2022/23 period. Average levels of anxiety have increased to 3.32 for the period 2022/23, and are higher than all previous years. Average ratings of life satisfaction, happiness and anxiety have deteriorated within Exeter [\[See reference 44\]](#).

C.22 Devon's Joint Health and Wellbeing Strategy for 2020 to 2025 was published by the Devon Health and Wellbeing Board in October 2019 setting out priorities and overall direction for the Devon Health and Wellbeing Board and local health, care and wellbeing organisations. Annual public health reports are published each year focusing on different themes [\[See reference 45\]](#).

C.23 Mental health indicators have worsened during early 2022, exacerbated by the cost-of-living crisis. Whilst this chart relates to adults, increased loneliness and mental ill health, and decreased wellbeing has been observed in both adults and children. It is increasingly recognised that we should be giving the same priority to mental health as physical health in terms of prevention, early intervention, treatment and rehabilitation. In Devon there are significant inequalities in relation to health particularly between some settlements. The leading causes of life lost to ill health, disability or early death for all ages here include cancer, cardiovascular disease, musculoskeletal disorders, respiratory infections and neurological disorders. Similar to other areas and countries, COVID-19 has influenced the positioning of respiratory infections in the latest data release. Cancer, cardiovascular diseases and musculoskeletal disorders have remained unchanged in their positioning of ranking over the past 15 years [\[See reference 46\]](#) [\[See reference 47\]](#).

Social Isolation

C.24 The Office of National Statistics has attempted to map loneliness rates by local authority between October 2020 to February 2021 during the COVID-19 pandemic. After a year of lockdowns, social distancing, and restrictions on travel and gatherings, some groups of people have reported high rates of

loneliness and poorer well-being. Areas with higher concentrations of younger people and higher rates of unemployment tended to have higher rates of loneliness during the study period. Local authorities in more rural areas had a lower loneliness rate than urban, industrial, or other types of area. In Exeter, 8.6% often or always felt lonely [See reference 48]. Age and marital status are also known to be significant factors in experiences of loneliness. Pre-pandemic, those aged 16 to 24 years, renting, and single were more likely to say they often felt lonely than older age groups or those who were married.

Open Spaces, Sport and Recreation

C.25 Open space and sports and recreation facilities in Exeter City provide residents with space in which they can undertake physical activity to the benefit of public health. The UK Chief Medical Officers advise that for good physical and mental health, adults should aim to be physically active every day. Over the course of a week adults should accumulate at least 150 minutes of moderate intensity activity; or 75 minutes of vigorous intensity activity day; or even shorter durations of very vigorous intensity activity; or a combination of moderate, vigorous and very vigorous intensity activity [See reference 49].

C.26 Additional health benefits relating to green space include acting to mitigate air and noise pollution as well as reducing the potential for residents to be affected by flooding. Human interaction with nature can also promote feelings of happiness and lowered diastolic blood pressure which is linked to stress [See reference 50].

C.27 The Audit of Outdoor Recreation Facilities [See reference 51] concluded that Exeter is well provided with open space but that it is not as well utilized as it could be to meet the full range of the City's needs and those of its extensive hinterland. Moreover some of the facilities would benefit from improvement. The Audit and the previous Parks and Open Spaces Strategy date back to 2005 and are currently in the process of being updated with a new Parks and Greenspace Strategy [See reference 52]. Work underway for the new Parks and Greenspace Strategy has found the following [See reference 53]:

Appendix C Baseline Information

- There are good levels of provision and distribution, with most people living within a 10 minute walk of a formal or informal green space;
- There is scope to join up smaller green spaces to form larger green corridors with active recreation and habitat benefits;
- Fields in Trust (formerly the National Playing Fields Association) suggests 0.8ha of formal (parks and gardens) open space for every 1,000 head of population. In Exeter there is 0.26ha of Formal greenspace and 0.85ha per 1,000 people when formal and informal green space are counted together;
- People value their local greenspace highly, regardless of any classification that may be placed upon it, and they have a connection to the greenspaces they use; and
- There remain problems of increasing costs and reduction in budgets, leaving limited options to safely maintain the land and assets the Council holds.

C.28 The challenge now is in making the most of Exeter's greenspaces. There is a good amount of greenspace in the city, but some of this is not in the areas of most need, and the traditional approaches to maintenance are simply too expensive. It is recognised that this needs to change. The Playing Fields and Pitches Needs Assessment completed in 2018 for the Council identified that increased provision was required to meet future demand as a result of planned housing growth. The assessment highlighted that additional sport pitches are required by 2026 based on the 2016/17 assessments, including for cricket, football and rugby [\[See reference 54\]](#).

C.29 A Playing Pitch Strategy [\[See reference 55\]](#) was undertaken for Exeter City in 2022. The strategy proposes a preliminary list of enhancements and upgrades to play pitch facilities across Exeter city following a review of demand and condition of existing facilities. The study found: .

- No football pitches are currently overplayed;
- Demand for artificial pitches;
- A lack of good quality local authority operated public access sites for cricket;

- Rugby pitches are currently overplayed and some existing fields are in poor condition;
- Demand for hockey cannot currently be met; and,;
- Under provision of outdoor courts with the capacity to create more.

C.30 With the population increasing and the need to provide housing, Exeter City Council needs to plan how to meet this need while making the most of available space. Exeter has developed proposals for a transformational Housing Delivery programme that has as one of its three pillars “great open spaces”. Today, as garden space for modern housing decreases, there is even greater pressure on the greenspaces within the City for physical and recreational activity, and also for the proven mental health benefits greenspace offers.

C.31 The Council’s green space has increased over the last 130 years to around 246ha. This includes parks, playing fields, allotments, woodlands and informal green space such as pocket parks. The City’s valley parks, which are now managed by Devon Wildlife Trust, add a further 140ha of publicly accessible land. Improvements have been made to Riverside Valley Park which includes footpath enhancements and replacement gates and steps. Exeter City Council and Devon Wildlife Trust have also put together a joint vision for the Northbrook Approach greenspace (former golf course) which connects Ludwell and Riverside Valley Parks. This vision was consulted on at the beginning of 2021, closing in April. The vision to become a wild arboretum and community space recognises the important role of this space as a corridor for both wildlife and people between the Valley Parks and demonstrates the commitment to improving the greenspace of the City in future. Plans have progressed to create the new arboretum with extensive tree and plant planting proposed [See reference 56]. Other land owners who allow public access are the Environment Agency, University and Forestry Commission. Exeter City Council states that it is now time to take a strategic view of how publicly accessed greenspace in the City is protected, enhanced and valued.

C.32 East Devon District Council, in conjunction with Natural England, Exeter City Council and Teignbridge District Council, commissioned a Green Infrastructure Strategy – this has been undertaken in two parts, the Study (April

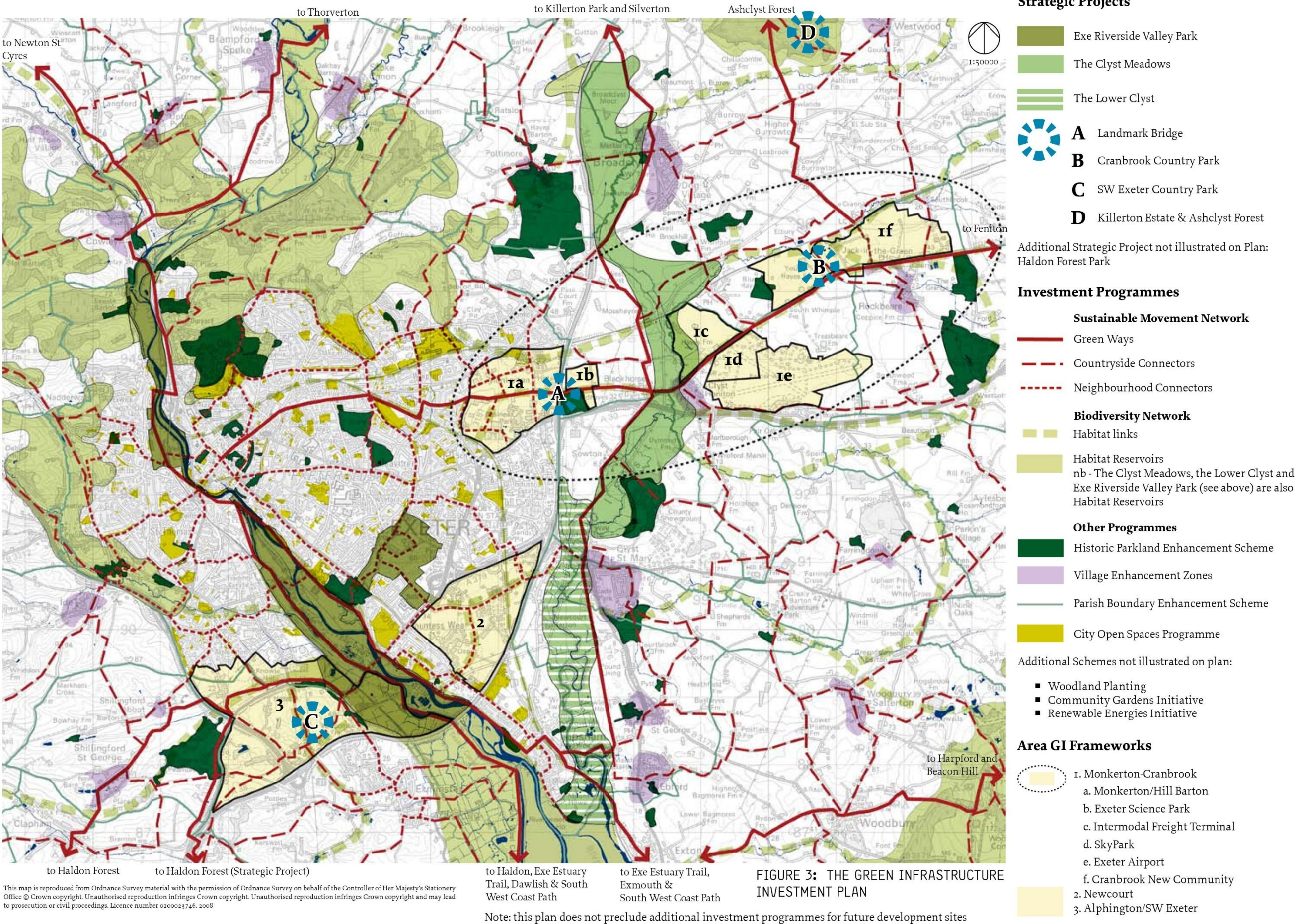
2009) and Strategy (December 2009) [See reference 57]. It has been recognised that the planning of Green Infrastructure is important for protecting and enhancing the environment and creating new assets for the benefit of wildlife and for humans to enjoy. The work is part of an ongoing commitment to Green Infrastructure development and delivery across the Exeter and East Devon and Teignbridge Growth Points that seeks to take a proactive approach to environmental planning, protection and enhancement whilst embracing economic regeneration, growth and sustainable development. In the particular, the study:

- Provides a framework to guide sustainable development;
- Enhances the accessibility of key assets, leisure facilities, open and semi natural green space, wildlife areas and the countryside;
- Identifies new opportunities for walking, cycling and other forms of sustainable transport to enhance the existing network;
- Establishes the broad framework required to improve recreation and leisure activities to promote healthier lifestyles;
- Identifies opportunities for creating linked habitat networks leading to increased ecological value, biodiversity and species persistence; – identifies general opportunities for the enhancement of quality, functionality and character of urban fringe landscapes in line with Countryside in and Around Towns (CIAT) guidance;
- Draws together existing data on the physical, natural, ecological, landscape and recreational assets; and
- Provides supporting information and a steer on the options available to offset/mitigate impacts on national and internationally designated sites in and adjacent to the core study area.

C.33 The Green Infrastructure Strategy (December 2009) outlines what is proposed where and why, including Strategic Projects and how the strategy will be executed. This is illustrated in Figure C.1, which is taken from the Strategy [See reference 58].

Figure C.1: Green Infrastructure Investment Plan

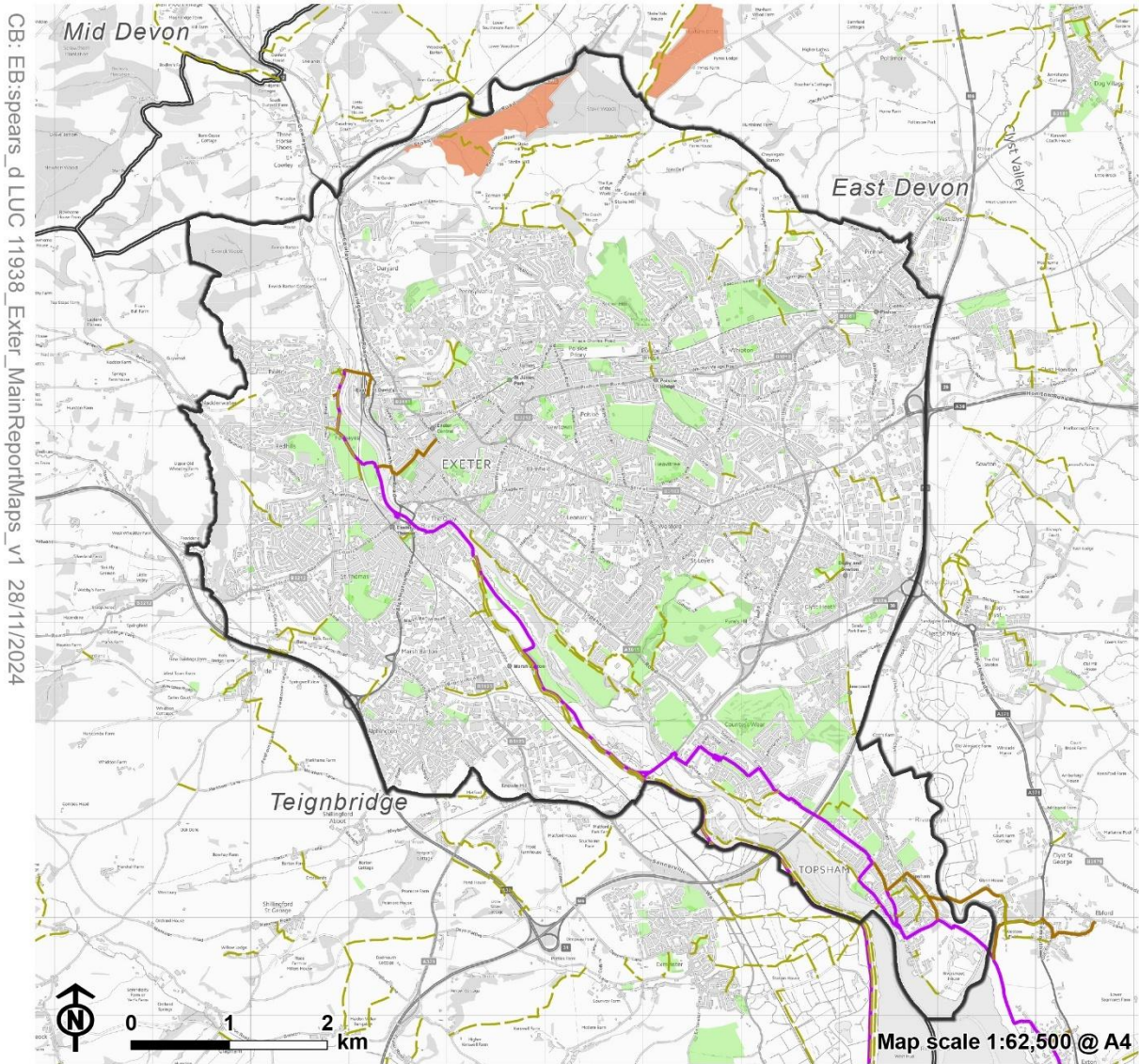
Figure C.1: Green Infrastructure Investment Plan



C.34 Devon County Council is responsible for 3,100 miles (4,990km) of public rights of way (see Figure C.2), and has a target of keeping 90% of public rights of way in an 'easy to use' condition. Since 2009 the proportion of rights of way classified as 'easy to use' in Devon has stayed above this 90% benchmark [See reference 59]. Building on this, as outlined as part of the Liveable Exeter programme, Exeter City has a vision for transformational change that includes a commitment to becoming an active and accessible City [See reference 60]. The Liveable Exeter goal is to build a sustainable City with 50% of people engaging in active travel, which focuses on walking and cycling, rather than travelling by private car. Liveable Exeter also retains and expands green spaces and valley parks to allow people to move around in a natural setting. Working with Sport England as one of 12 national pilots, Exeter aims to be the most active City in the UK by creating infrastructure that simultaneously reduces congestion and improves the health and wellbeing of its citizens. Sport England's 10 Active Design Principles are a key objective of the Liveable Exeter plan. The principles take a fresh look at the opportunities to encourage and promote sport and physical activity through the design and layout of our built environment. Exeter is committed to working with these principles as a means to improve health and wellbeing, cutting congestion in the City. The principles are:

- Activity for all;
- Walkable communities;
- Connected walking and cycling routes;
- Co-location of community facilities;
- Network of multifunctional open space;
- High quality streets and spaces;
- Appropriate infrastructure;
- Active buildings;
- Management, maintenance, monitoring and evaluation; and
- Activity promotion and local champions.

Figure C.2: Recreation and access routes



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Figure C.2: Recreation and access routes

- Exeter City boundary
- Neighbouring authority
- Recreation and Rights of Way**
 - Green space
 - Common Land
 - Public Right of Way
 - National Cycle Network
 - National Cycle Network Link

Levels of Physical Activity

C.35 The most recent Active Lives Survey (reporting for the period November 2022-23) estimated that 20.3% of the population in Exeter are classified as inactive, doing less than 30 minutes of moderate exercise a week. This is similar to the figure for Devon of 21% for the same period. It is reported that 72.4% of the population of Exeter met the aerobic guidelines of at least 150 minutes of moderate activity per week. This figure is more than the Devon figure of 69.4% [\[See reference 61\]](#).

C.36 In Exeter 76.8% of people walk or cycle once a week. The walking and cycling average was higher than the national average for England at 70.9% [\[See reference 62\]](#).

Services and Facilities, including Education

C.37 Exeter acts as a hub and significant catchment for employment, retail, professional services, education, health and leisure and culture both its residents, nearby towns and villages and also those further afield. This is demonstrated by Exeter being at the heart of a travel to work area of over 470,000 residents, approximately 35,000 people commuting into Exeter on a daily basis (pre COVID-19), and a shopping catchment of over 550,000 [\[See reference 63\]](#). The University of Exeter and Exeter College are also centres of educational excellence and both continue to expand.

C.38 Across Exeter, there are 36 primary schools, 18 secondary schools, six colleges, three special schools and one University.

C.39 It is the statutory duty of Devon County Council to ensure efficient school places for children in the county. Devon County Council produced an Education Infrastructure Plan 2016-2033 [\[See reference 64\]](#). The overall forecast for

Devon predicts an increasing need for primary provision until at least 2021 and secondary education until at least 2026. Within Exeter there has been a significant increase in births and migration into the City over recent years requiring additional provision at primary level. This may impact at secondary level in future years. There is particular pressure west of the Exe and to the east of the City, where schools are on restricted sites and large housing developments are proposed. Table C.4 below shows the likely new primary school provision required (regarding new schools, not new places at existing schools). Newcourt is receiving two new schools, the first of which has been delivered, as has Monkerton while SW Exeter is under construction.

Table C.4: Exeter likely new primary school provision required between 2016 and 2023

Area	Infrastructure	Potential Timescales
Monkerton	Up to 630 primary places plus nursery (2-11 years)	2016-2026
Newcourt	420 primary places plus nursery (2-11 years)	2016-2020
Newcourt	Up to 420 primary places plus nursery (2-11 years)	2021-2026
Water Lane	210 primary places plus nursery (2-11 years)	2021-2026
SW Exeter	New Secondary Provision to support development in Teignbridge as well as Exeter and on Exeter's borders (e.g. East Devon).	2019-2033

Deprivation

C.40 The Indices of Deprivation 2019 [\[See reference 65\]](#) provide a relative measure of deprivation in small areas across England. It is based on the

concept that deprivation consists of more than just poverty. Poverty is not having enough money to get by on, whereas deprivation refers to a general lack of resources and opportunities.

C.41 Seven domains of deprivation are measured – income deprivation, employment deprivation, health deprivation and disability, education skills and training deprivation, barriers to housing and services, crime and living environment deprivation. Each domain contains a number of indicators. The seven domains are combined to give a multiple deprivation score. The data is now based on identified neighbourhoods known as ‘Super Output Areas’ (SOAs) rather than wards.

C.42 In terms of ranking, deprivation is measured across geographies known as Lower Layer Super Output Areas (LSOAs). A lower number indicates higher levels of deprivation. Table C.5 shows Exeter City and its neighbouring authorities ranked out of the 326 local authorities in England.

Table C.5: Deprivation ranking by district in England

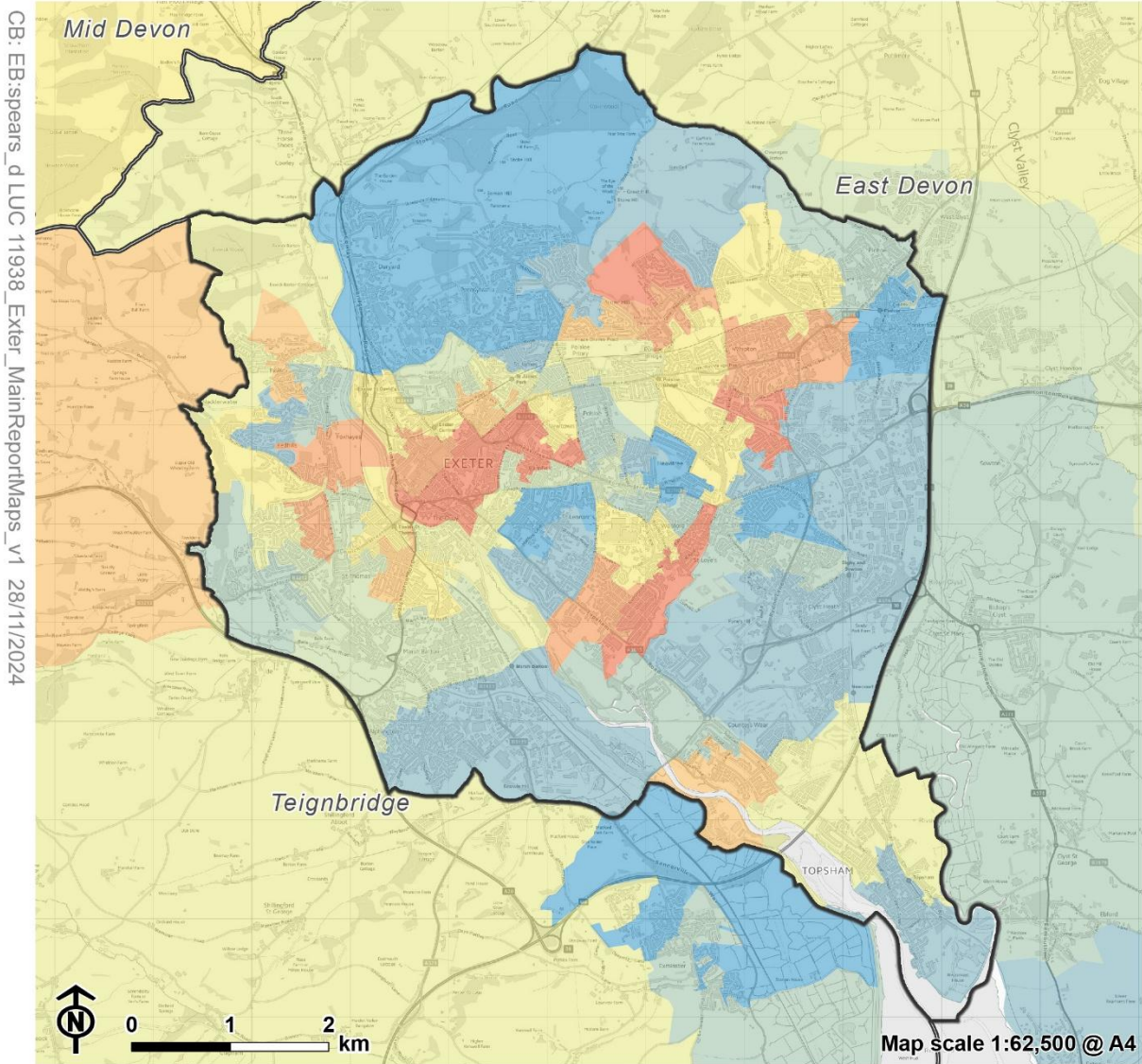
Local Authority	2010	2015	2019
Exeter	139	165	193
East Devon	209	246	238
Mid Devon	155	156	162
Teignbridge	175	177	186

C.43 There has been a significant decrease in the level of deprivation in Exeter during the period 2010-2019. Overall, Exeter would not be considered deprived (see Figure C.3). Deprivation, however, does exist. This deprivation is largely concentrated to small pockets within urban locations. There are nine areas in Exeter that are within the 20% most deprived parts of the UK. Different types of deprivation affect rural and urban communities more severely; factors such as living environment (i.e. the quality of the local environment which is measured by factors such as air quality and road traffic accidents), have greater effect on

Appendix C Baseline Information

urban communities whilst education, skills and training deprivation is more of a factor on rural communities.

Figure C.3: Distribution of deprivation



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Figure C.3: Distribution of deprivation

- Exeter City boundary
- Neighbouring authority

Index of Multiple Deprivation 2019

- 0 - 10% (most deprived)
- 10 - 20%
- 20 - 30%
- 30 - 40%
- 40 - 50%
- 50 - 60%
- 60 - 70%
- 70 - 80%
- 80 - 90%
- 90 - 100% (least deprived)

Crime and Safety

C.44 Exeter has the highest incidences of crime out of any major town/City in Devon and is among the top 20 overall for crime levels out of Devon's 403 towns, villages, and cities [\[See reference 66\]](#). The overall crime rate in Exeter in 2023 was 44 crimes per 1,000 people. This compares poorly to Devon's overall crime rate, coming in 7% higher than the Devon rate of 41 per 1,000 daytime population. Exeter is among the top 5 safest major towns, and the 5,089th most dangerous location out of all towns, cities, and villages.

C.45 The most common crimes in Exeter are violence and sexual offences, with 2,759 offences during 2023, giving a crime rate of 19. This is 35% lower than 2022's figure of 4,242 offences and a difference of 10.30 from 2022's crime rate of 29. Exeter's least common crime is robbery, with 41 offences recorded in 2023, a decrease of 11% from 2022's figure of 46 crimes.

C.46 The Exeter Community Safety Partnership [\[See reference 67\]](#), which brings together various agencies, was established in 2002 and aims to make Exeter the safest City in the South West. The use of community patrolling, community police support officers and various neighbourhood engagement initiatives have proved extremely effective, particularly in addressing low level crime and anti-social behaviour. It is important that, as the City grows, this work continues to be built upon to ensure Exeter remains a safe place to live. The partnership decides the priorities for the City each year based on information from the police, partner organisations, residents and businesses as well as national concerns. The priorities for Exeter for 2020 are:

- Radicalisation and hate crime;
- Locality based anti-social behaviour problem solving;
- Sexual violence and domestic violence and abuse; and
- Reducing serious violence and organised crime including county lines.

Economy

C.47 The Devon economy has witnessed steady growth since 1997 with an increase of 102% between 1997 and 2015 [See reference 68]. Exeter plays a central role in the county's economy, making contributions to total employment and real value added significantly above its share of population. The City is the administrative centre of Devon, with the County Council based here, and is home to a number of major employers in both the public and private sectors. This is reflected in the City's specialisms in sectors such as public administration and education. The City is also an important retail location, serving a catchment area that extends well beyond the City's boundaries [See reference 69].

C.48 Exeter accounts for more than a quarter of employment in the county and reports an employment density (1.26) above the national average (0.89) [See reference 70]. It attracts a workforce that extends beyond the City boundary to take advantage of the large number and diversity of employment opportunities available. The City is home to a number of major employers, including the County Council, university and police headquarters, and has varied sectoral strengths including utilities, public administration and health and social work. The dominance of large employers means that the City's business density is the lowest of the Devon districts.

C.49 In 2015, the total output (Gross Value Added, GVA) in Exeter reached £4.08 billion. The trend of GVA for Exeter has been increasing in recent years, in 2014 GVA was £3.91 billion and £3.67 billion in 2010 [See reference 71]. Exeter also has the highest productivity levels in Devon equivalent to 93% of the national average.

Business Sectors and Employment Rates

C.50 Exeter contains a range of businesses in sectors including those in the human health and social work, wholesale and retail trade, education,

professional, scientific and technical and public administration and defence. Table C.6 below shows the breakdown of employee jobs by industry [\[See reference 72\]](#).

Table C.6: Employee jobs by industry in Exeter (2022)

Industry	Employee Jobs	Percentage
Human Health and Social Work Activities	18,000	18.9%
Wholesale And Retail Trade; Repair of Motor Vehicles and Motorcycles	12,000	12.6%
Education	12,000	12.6%
Professional, Scientific and Technical Activities	9,000	9.5%
Administrative and Support Service Activities	6,000	6.3%
Public Administration and Defence; Compulsory Social Security	8,000	8.4%
Accommodation and Food Service Activities	6,000	6.3%
Information and Communication	4,000	4.2%
Construction	4,000	4.2%
Manufacturing	2,500	2.6%
Transportation and Storage	3,000	3.2%
Arts, Entertainment and Recreation	2,500	2.6%

Industry	Employee Jobs	Percentage
Other Service Activities	1,750	1.8%
Financial and Insurance Activities	1,500	1.6%
Water Supply; Sewerage, Waste Management and Remediation Activities	1,500	1.6%
Real Estate Activities	1,500	1.6%
Electricity, Gas, Steam and Air Conditioning Supply	1,000	1.12%
Mining and Quarrying	10	0%

C.51 Between April 2023 to March 2024 the rate of economically active residents in the South West was 81%. During the same period the figure for Exeter was 83.8%. Furthermore, in Exeter 9.4% were self-employed, and 2.9% unemployed, with the remaining either full-or part-time employed. This compared to 3.9% unemployment nationally [\[See reference 73\]](#). Exeter is home to a highly skilled population. The skills profile of the working age population is more highly qualified than either Devon or England wide.

C.52 In 2023, gross weekly pay in Exeter was £657.20, which was slightly lower than both the regional average of £663.70 and the national average of £682.60.

Business Stock

C.53 In 2021 Exeter had a total of 4,475 Business Enterprises, of which 96.7% were Micro or Small [\[See reference 74\]](#). The total figure has steadily increased over the years, from 3,455 Business Enterprises in 2011. Exeter has a small business base relative to the size of its working age population. In 2012, the business density was below the county-wide, regional and national averages, with 50 businesses for every 1,000 working age residents. This was the lowest

density of all of the Devon districts. This low business density figure reflects the number of large employers that employ over 1,000 people including Exeter University, the NHS Foundation Trust, the police and the County Council.

C.54 Exeter's existing employment land supply is currently being monitored and reviewed. The total area of employment land is around 350 hectares and the majority, in the region of 315 hectares, falls within the classification of established employment areas. Of the remainder, around 15 hectares is located within other existing employment areas, around seven hectares consists of undeveloped allocation land, and approximately five hectares of land contains sites with planning permission for planning use classes B1, B2 and B8. The amount of employment land detailed here demonstrates the continued importance of Exeter as a regional employment destination, and support for Exeter's economy [\[See reference 75\]](#).

Retail

C.55 Exeter is an important retail location, serving an area that extends well beyond the City's boundaries. The Exeter and West End of East Devon Retail and Leisure Study 2016 explains that Exeter City centre has good levels of vitality and viability and remains a healthy centre. The key attributes of the City centre are its wide range of comparison and convenience goods retailers, its growing service use offer and falling vacancy rate. The Princesshay shopping centre provides a central point for retail activity and continues to be very successful [\[See reference 76\]](#).

C.56 The three district centres, at Topsham, St Thomas and Heavitree, are all performing their stated role, serving both their local catchments and a wider area across part of the Exeter urban area. It has been recommended that all three should retain their role as district centres given the scale of retail and main town centre uses that they provide along with their convenience and comparison goods market shares.

C.57 Exeter was ranked the 30th biggest retail centre in the UK by CACI in 2011 with an expenditure of £710m, and the second largest primary retail centre in the South West. This position leads to the wholesale and retail sector being the second highest employment sector in the Exeter.

C.58 Town centres and particularly retail were some of the hardest hit areas during the COVID-19 pandemic. In the week ending 26th June 2020, retail footfall in the South West was 80% of the equivalent week in 2019, compared to 75% across the UK. Footfall was strongest at retail parks at 95%, but lower at shopping centres and high streets at 70% and 68% respectively. The longer term patterns are unknown but it is likely that footfall will eventually return to near pre COVID-19 levels.

C.59 The Greater Exeter Town centre and Retail Study identifies a quantitative capacity need for convenience goods floorspace at 5,483sqm net sales area in 2029. In relation to comparison goods floorspace there is expected to be 14,281sqm net sales area [\[See reference 77\]](#).

Transport

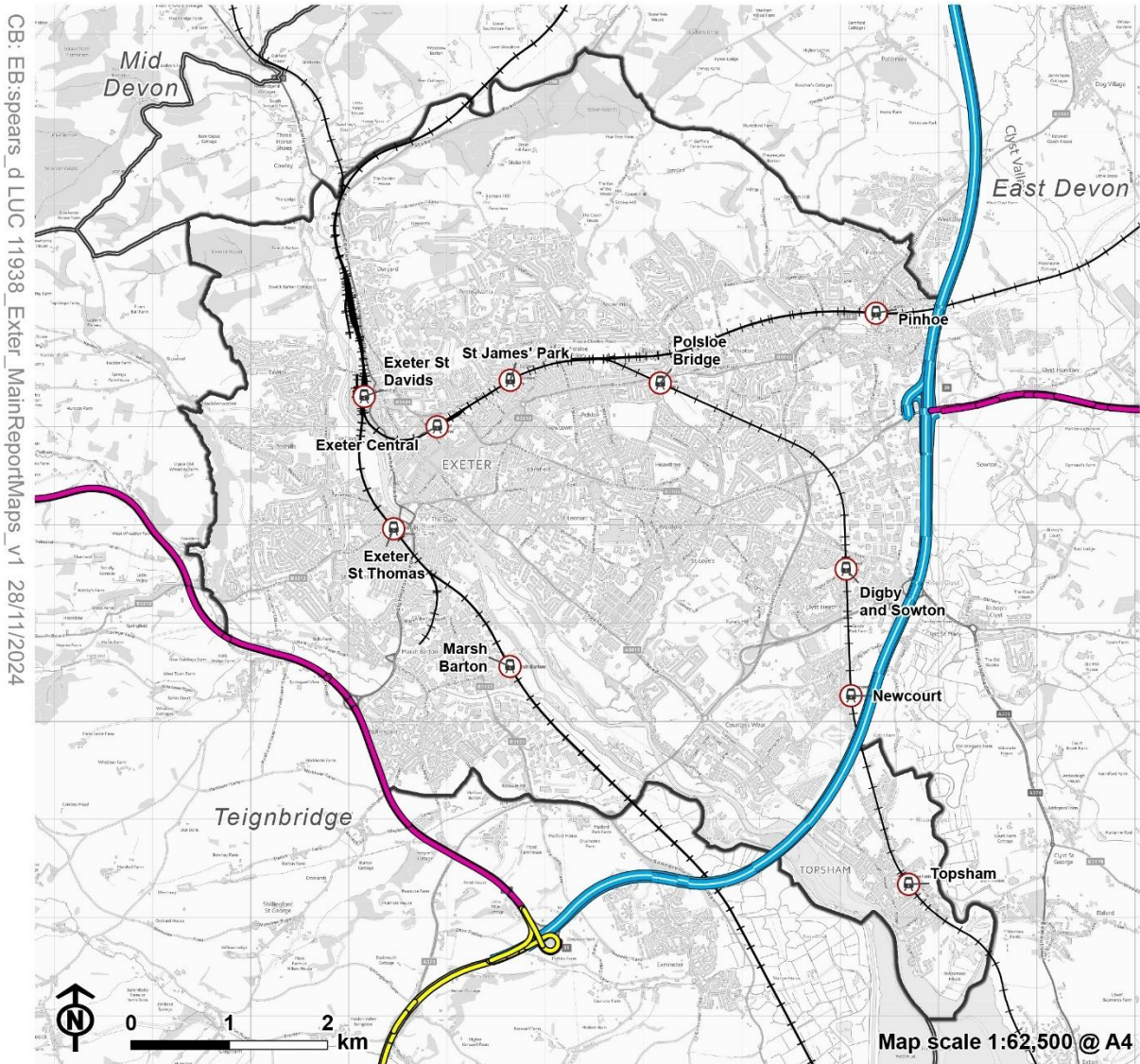
C.60 Exeter is served by the M5 motorway, and the A30 and A38 trunk roads, and benefits from the convergence of five railway lines, including fast connections to London and the North (see Figure C.4). Train services connect the City to the main commuter towns of Exmouth and Crediton. Exeter International Airport is only 7km from the City Centre.

C.61 According to the 2021 Census data, the car was the main method used to travel to work (37.2%). A high number of the Exeter City population work mainly at or from home equating to 30.6% of the population. Approximately 20.8% of the population are able to walk or cycle to work indicating almost a quarter of the population live in close proximity to their workplace [\[See reference 78\]](#).

C.62 According to the 2011 Annual Population Survey, there was an outflow of 10,223 commuters from Exeter and inflow of 43,816 – providing a net flow of

workers into the City of 33,593. These commuters were predominantly drawn from the surrounding districts of East Devon, Mid Devon, and Teignbridge. When compared with Figure C.5 illustrating commuter flows from 2001, the inflow of commuters has continued from the surrounding districts of East Devon, Mid Devon, and Teignbridge but increased since 2001, while the outflow between 2001 and 2011 has remained relatively constant.

Figure C.4: Transport network



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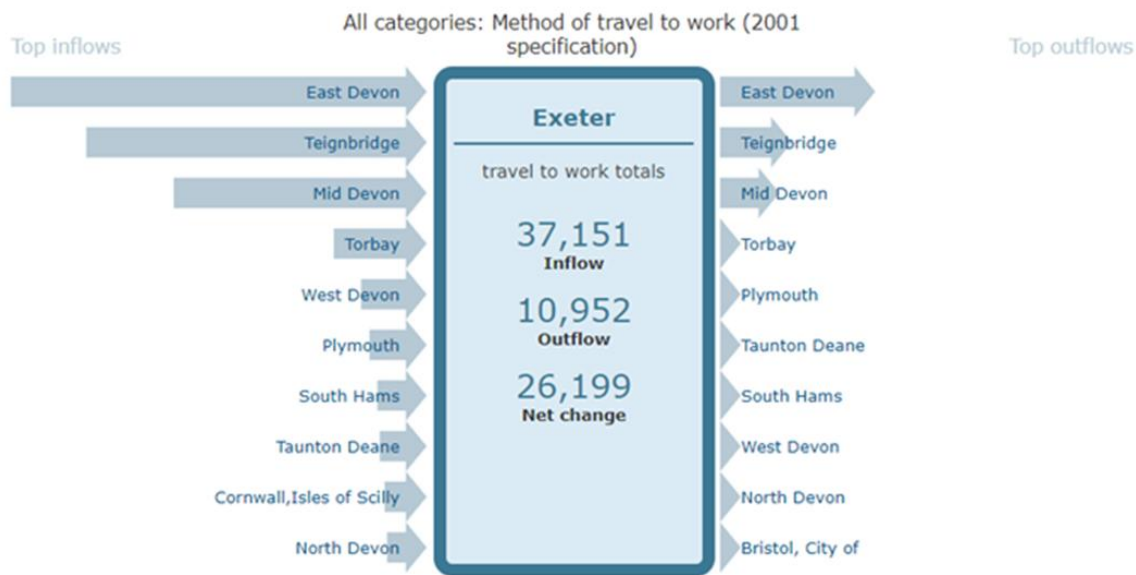
Figure C.4: Transport Network

- Exeter City boundary
- Neighbouring authority

Road network

- M5
- A30
- A38
- Railway
- Railway station

Figure C.5: Flows of commuters in and out of Exeter (total) (2011)



Road Network and Traffic Growth [See reference 79]

C.63 Exeter has excellent transport links, particularly when compared with the rest of Devon. The M5, connecting the South West with the Midlands, ends south of Exeter, where strategic transport links westbound to Cornwall via the A30 and A38 continue. In addition, the A380 runs south of Exeter to Torbay and the A303 to the east of the county.

C.64 The Exeter Travel to Work Area (TTWA) has grown considerably in recent years and is now the second largest geographical TTWA in the country (behind Cambridge). The growth in Exeter jobs has been filled by labour from outside the City leading to rising levels of inward commuting, 48% in the last Census.

C.65 Between 2001 and 2011 there has been an increase of 7,500 people travelling into Exeter from outside the City for work, and significant jobs and housing growth in Exeter. Despite this, traffic levels on key routes into the City

have not increased. Additional travel demand into the City has instead been accommodated by the residents of Exeter shifting to sustainable travel modes. As a result, the balance of travel for Exeter residents has shifted to a point where the majority of Exeter residents now travel to work by sustainable modes. Exeter residents still represent the largest part of Exeter's labour pool (52%) and, account for 35% of car-based commute trips to a destination in the City. This therefore represents the single largest population area to target any measures to reduce car usage and a move to low carbon travel choices.

C.66 Reflecting the compact nature of the City and close proximity to employment sites, Exeter residents have more travel choices and are most likely to change modes to walking, cycling or public transport.

C.67 Travel behaviour differs for commuters living outside the City, with 80% of trips into the City by car. In rural areas, where there are limited alternatives, car dominance is even more prominent with over 90% travelling to the City by car.

C.68 Looking forward over the next 20-25 years, the numbers employed in Exeter are expected to increase by another 25-30%. With existing transport networks already at capacity in peak periods and a need to ensure increased demand does not lead to increased carbon emissions, providing capacity for future growth will depend on effective sustainable alternative travel choices and more sophisticated management of existing transport corridors.

C.69 Alongside this, urban centre regeneration schemes must strive to reduce the dominance of vehicular traffic and ensure amenities and services are located within a reasonable walking and cycling distance.

C.70 The transition to a carbon neutral transport system will require an accelerated change. A key challenge will be how best to embrace innovation and invention to support this transition and ensuring the safety of all users in a complex highway environment.

C.71 It is important to bear in mind that travel to work patterns have been significantly impacted upon by increased working from home since COVID-19, and the effects of this has not been shown in relevant traffic data yet.

Public Transport

C.72 Exeter already has excellent coverage by public transport. Compared to other cities of comparable size, only Oxford (17%) has significantly higher public transport mode splits for commuting than Exeter (11%). The customer satisfaction rating of 95% for Stagecoach South West is also one of the highest in the country. There are, however, journey time reliability issues on core routes which can reduce the attractiveness of public transport [\[See reference 80\]](#).

C.73 Cycling levels have grown following the Cycle Demonstration Town project from 2006-2010. However, Exeter's commute cycle mode split (6%) is below other similar cities including Norwich (9%), York (12%), Oxford (17%) and Cambridge (30%).

C.74 The Exeter City Council Authority Monitoring Report 2021-2022 continues to demonstrate Exeter's increasing coverage by public transport, including:

- Bus and rail infrastructure:
 - Exeter Bus Station: The new bus station opened in July 2021, offering improved passenger facilities. The bus station is broadly in the same location and has come forward as part of the wider development of the new Council leisure centre.
 - Marsh Barton Rail Station: Works commenced in spring 2021 and the new rail station is due to be completed in winter 2022/23. Council Community Infrastructure Levy (CIL) receipts are part of the funding package for the station. There will also be an associated pedestrian/cycle bridge, access, parking/turning area, a pedestrian/cycle path and a Co Bikes station.

- Pinhoe Rail Station Interchange: Works to improve the attractiveness and facilities available at Pinhoe station progressed during 2021/22. Facilities will include cycle lockers, a Co Bike station, car park with electric vehicle charging points, taxi and bus bays, and a new bus link with onward travel to Exeter airport.
- Exeter Park and Change: The site located at Exeter Science Park (East Devon administrative area) opened in July 2021. It provides 300 parking bays, to include electric vehicle charge points, enabling drivers to then switch to sustainable forms of transport for their journey into the city.
- The Dartmoor Line: The improved rail service between Exeter and Okehampton opened in November 2021. As well as a service throughout the year to Okehampton, this provides an increased frequency of two trains per hour, departing Exeter stations for Crediton.
- Cycle and pedestrian enhancements: In 2021/22 numerous traffic calming measures were introduced along Exeter's strategic cycle routes. These include:
 - Sweetbrier Lane: Pedestrian/cycle road safety scheme completed.
 - Cycle Routes E3 and E9: Temporary traffic calming measures made permanent.
 - Bulls Farm Road: Modal filter introduced limiting vehicle access.
- Strategic road infrastructure:
 - South West Exeter is a new development on the edge of the city. It is expected to deliver 2,500 new homes, 2000 within Teignbridge District Council and up to 500 within Exeter City Council's boundary, and 21.5 hectares of land for new employment. The development needs a large amount of infrastructure to support it, largely within Teignbridge District Council's administrative boundary, including new roads and junctions, a pedestrian/cycle bridge, a community building and a new public park. Devon County Council secured funding to deliver works in this area to support the development and delivery began in August 2020.

C.75 Exeter's on street electric bike hire scheme has grown to provide 150 e-bikes in the Co Bikes network at 35 stations across Exeter and the surrounding areas. The bikes average over 3,000 trips per week with 120,000 trips made in 2021. Co bike stations at Honiton Road Park and Ride, and Pinhoe station were progressed during the reporting period.

C.76 Eight rapid electric vehicle charging hubs were approved across Exeter and installation began during 2021/22.

Biodiversity

C.77 Biodiversity is the term used to describe both wildlife species and their habitats. The Government's planning policy seeks to protect and enhance biodiversity and geodiversity by identifying and mapping local wildlife-rich habitats and wider ecological networks and promote their conservation, with opportunities for achieving measurable net gains in biodiversity secured.

C.78 Exeter contains a rich variety of wildlife habitats due to a combination of geology/topography and geography combined with enlightened protection and enhancement (see Figure C.6). The Exe Estuary is designated as an internationally important wetland area under the RAMSAR Conservation on Wetlands and also as a Special Protection Area under the EC Birds Directive and these designations extend into the very southern area of Exeter City. There are three Sites of Special Scientific Interest (SSSIs) in Exeter – the Exe Estuary, Stoke Woods and Bonhay Cutting. There are two Local Nature Reserves (LNR's), Barley Valley and Belvidere Meadows, and a number of Sites of Importance for Nature Conservation (SINCs) (also known as Local Wildlife Sites). Exeter has a number of priority habitats, including inter-tidal habitats such as mud flats and saltmarsh. There are also habitats for certain protected species; for example otters, bats and badgers.

C.79 Exeter also has six Valley Parks, which offer opportunities to experience wildlife and natural, open spaces. They frame the City and are looked after for

people and nature by Devon Wildlife Trust, following their transfer from Exeter City Council in May 2019.

C.80 The following three SSSIs are located in Exeter, although the Exe Estuary extends beyond Exeter City Council's administrative boundary:

- Bonhay Road Cutting: 0.26ha (designated for geological features)
- Exe Estuary: 2190.10ha (designated for ecology)
- Stoke Woods: 91.63ha (designated for ecology)

C.81 Natural England assesses the condition of SSSIs in England with the objective to achieve 'favourable condition' status for all SSSIs. Favourable condition means that the SSSI's habitats and features are in a healthy state and are being conserved by appropriate management. In 2022, Natural England's assessment found Exeter's SSSI's to predominantly be meeting 'favourable' or 'unfavourable recovering' condition criteria with the exception of the Bonhay Road Cutting SSSI [\[See reference 81\]](#). More detail is contained within Table C.7.

C.82 The Conservation of Habitats and Species Regulations 2017 require the City Council to ensure that the impacts of development on European sites are mitigated – for the HRA of the Local Plan this is expected to involve consideration of the protected habitats of the Exe Estuary SPA and Ramsar site, Dawlish Warren SAC and the East Devon Pebblebed Heaths SAC. Consent cannot legally be granted for a development that would either alone or in combination with other developments, have a likely significant effect on a European wildlife site, unless full mitigation is provided.

C.83 Residential development in Exeter is considered to have the potential to impact on these protected habitats because it accommodates a growing population which places increased recreational pressure on them. The visitor pressure comes either from developments in themselves or from developments in combination with others. Protecting these site is important for a number of reasons including providing safe areas for all users to enjoy while caring for the wildlife these sites support.

C.84 Developer contributions collected through Habitats Mitigation payments, the Community Infrastructure Levy and Section 106 Agreements are ways in which developers are required to contribute towards mitigation of the impact of their development. In 2020/21 Exeter City Council provided £80,117 of developer contributions to the South East Devon Habitats Regulation Partnership which goes towards the management of these important habitats. This is a partnership between Exeter City, East Devon District and Teignbridge District Councils.

C.85 Vulnerability issues for habitats in Exeter include the following:

- Direct loss of habitats;
- Habitat fragmentation/isolation;
- Urbanisation impacts (lighting, traffic collisions, fire, noise, cat predation, invasive species, pollution);
- Air and water quality/quantity impacts; and
- Recreational impacts.

C.86 Devon Local Nature Partnership is currently preparing a Local Nature Recovery Strategy for Devon.

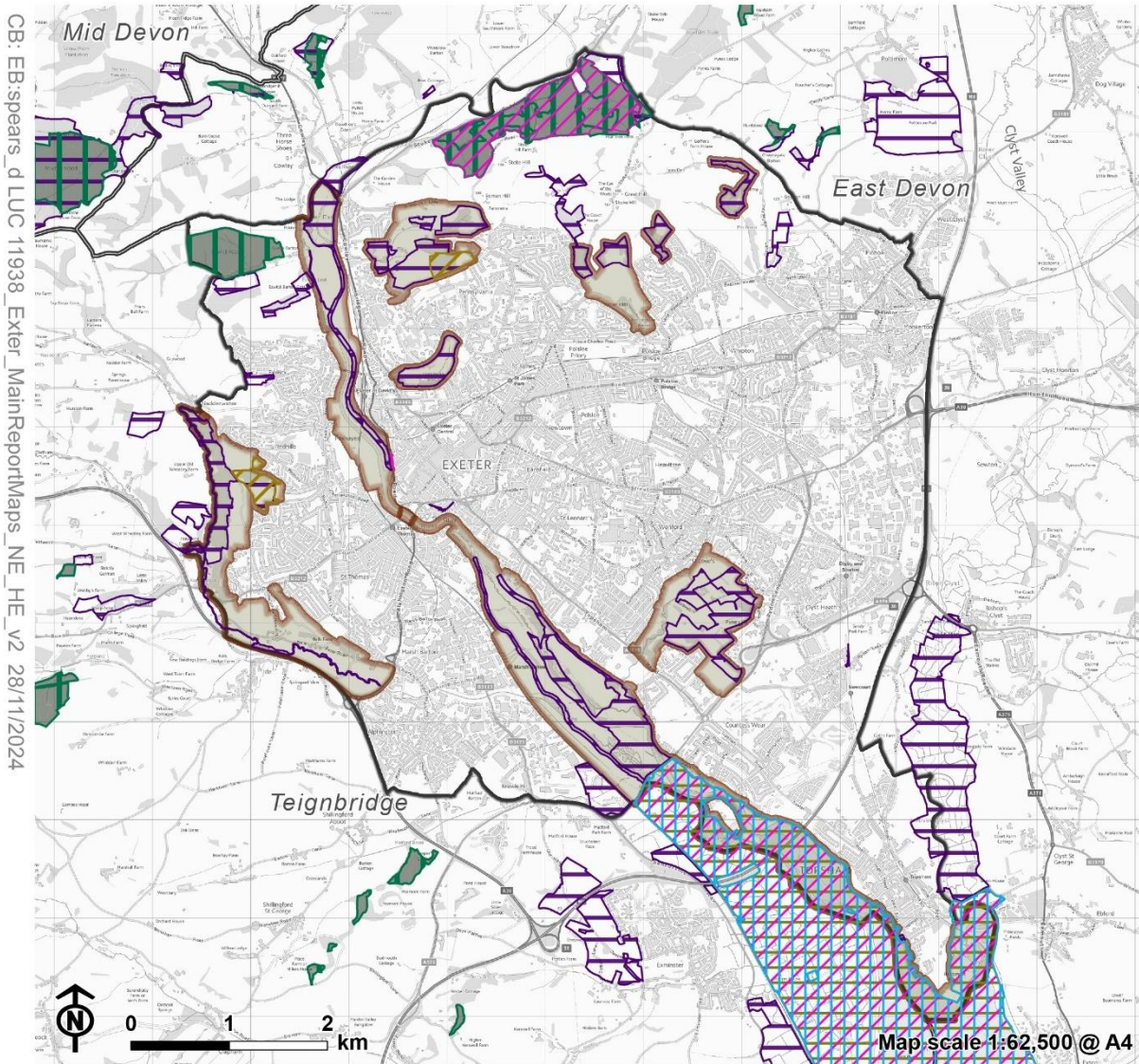
Table C.7: Natural England’s SSSI Condition Assessment 2023

Location	Favourable or Unfavourable Recovering Condition	Favourable Condition	Unfavourable Recovering Condition	Unfavourable Declining Condition
Bonhay Cutting SSSI	0%	0%	0%	100%
Exe Estuary SSSI	99.62%	83.95%	15.67%	0.38%

Appendix C Baseline Information

Location	Favourable or Unfavourable Recovering Condition	Favourable Condition	Unfavourable Recovering Condition	Unfavourable Declining Condition
Stoke Woods SSSI	100%	14.83%	85.17%	0%
Devon	74.19%	29.34%	44.85%	5.50%
England	66.64%	39.19%	22.45%	8.74%

Figure C.6: Environmental designations



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Figure C.6: Environmental Designations

- Exeter City boundary
- Neighbouring authority

Natural Heritage

- Special Protection Area
- Site of Special Scientific Interest
- Ramsar
- Local Nature Reserve
- Area of Wildlife Interest
- County Wildlife Site
- Valley park
- Ancient woodland

Historic Environment

C.87 For the last two millennia Exeter has been the main commercial, administrative, political, ecclesiastical and cultural centre for the immediate region. As a result, and despite the ravages of WWII bombing and immediate post war redevelopment, it still possesses a wealth of historic assets, ranging from buried remains of prehistoric settlement, of internationally important Roman military remains, to a rich visual heritage of standing buildings – City walls, castle, cathedral, churches, housing and shops, industrial buildings, farmhouses, canal and waterfronts. Outside the historic core, there are historic settlements that now form part of the outer City suburbs, and also significant buried remains of prehistoric and Roman date that are being revealed by development on the outskirts of the City [See reference 82]. The wealth of built heritage makes an important contribution to the cultural and economic well-being of the City.

Heritage Assets

C.88 Exeter has a range of unique designated heritage assets that contribute to the character and distinctiveness of the City. These assets include Scheduled Monuments, Historic Parks and Gardens, Conservation Areas and a range of listed buildings (Grade I, II and II*) [See reference 83]. These assets are shown in Figure C.7.

C.89 Highlighted in the National Planning Policy Framework, non-designated heritage assets are singular buildings, structures and monuments or landscapes that are believed to have a degree of heritage significance and make a significant contribution to local character, identity and sense of place. However, despite their level of heritage significance, these sites do not meet the criteria set out for statutory listing through Historic England [See reference 84].

C.90 There are over 1,900 Listed Buildings in Exeter. The size, age, condition, appearance and use of these buildings vary enormously. The vast majority of

Listed Buildings are of Grade II classification and are currently used as domestic residential dwellings and farmsteads. They make a very significant contribution to the quality of streetscape and countryside.

C.91 A Conservation Area is defined as “an area of special architectural or historic interest, the character of which it is desirable to preserve or enhance”. There are 20 conservation areas in Exeter. In addition to containing notable concentrations of designated and un-designated historic buildings, Conservation Areas frequently contain high archaeological potential relating to centuries of cumulative settlement activity.

C.92 A Registered Historic Park and Garden is a designed landscape considered to be of national importance and included on the national Register. There are two Registered Historic Parks and Gardens in Exeter.

C.93 A Scheduled Monument is an historic (not currently in residential or ecclesiastical use) building or site considered to be of national importance which is included in the Schedule of Monuments. This Schedule includes archaeological sites and monuments, including upstanding buildings or ruins and also below ground evidence. Scheduled Monuments include Bronze Age burial mounds, Iron Age hillforts, Roman forts, villas and larger settlements, medieval castles, bridges, earthworks, the remains of deserted villages and more modern industrial sites. There are 80 Scheduled Monuments in Exeter. Some of these assets are particularly well known and valued such as the Roman legionary bath house, Exeter City Wall, Rougemont Castle, Medieval Exe Bridge and the Underground Passages. The Scheduled area of the Roman legionary fortress and civil town, beneath Cathedral Close, is also extensive.

C.94 The historic city centre of Exeter is one of five areas designated as an Area of Archaeological Importance under the Ancient Monuments and Archaeological Areas Act 1979.

Heritage at Risk

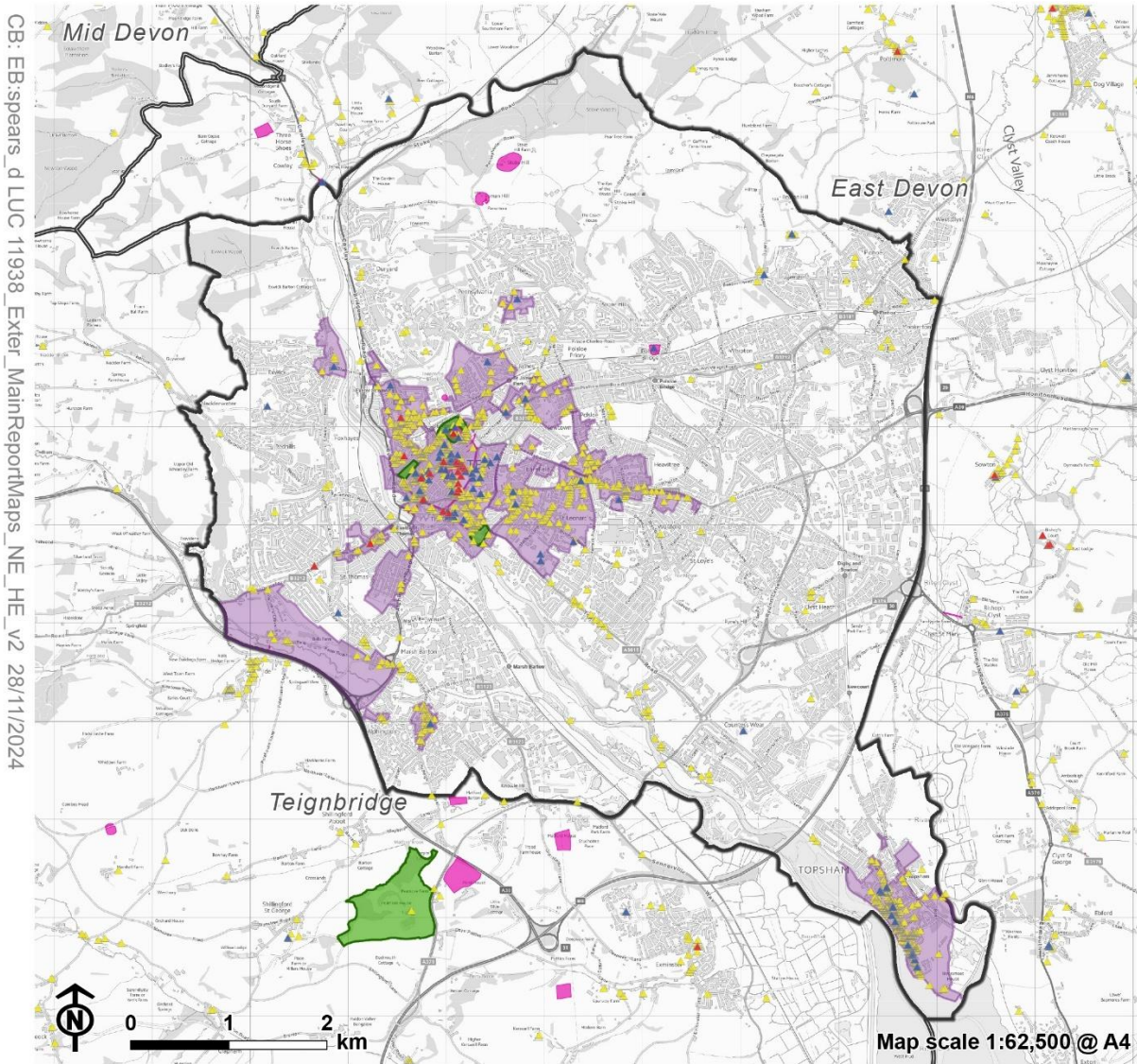
C.95 Historic England has a Heritage at Risk Register which includes historic buildings, of Grade II* and Grade I listed buildings (Grade II listed buildings are only included for London), sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair.

C.96 The heritage assets (including Conservation Areas) identified on the Historic England Heritage at Risk Register as being at risk in Exeter and information about their heritage category and condition are shown in Table C.8 below [\[See reference 85\]](#).

Table C.8: Heritage assets on Historic England’s Heritage at Risk Register in Exeter

Designated Site	Category	Condition
Church of St Thomas the Apostle, Cowick Street, Exeter	Listed Place of Worship Grade I	Poor
Church of St Mary Steps, West Street, Exeter	Listed Place of Worship Grade I	Poor
Exeter City Walls	Scheduled Monument	Generally satisfactory but with minor localised problems

Figure C.7: Heritage assets



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Figure C.7: Heritage Assets

- Exeter City boundary
- Neighbouring authority
- Cultural Heritage**
 - Scheduled Monument
 - Registered Parks and Gardens
 - Conservation area
 - Listed building Grade I
 - Listed building Grade II*
 - Listed building Grade II

Landscape

C.97 Containing some of the best loved landscapes in the country, Devon has been a magnet for visitors and new inhabitants alike. The coastline, historic towns, nature reserves and Areas of Outstanding Natural Beauty are valuable assets; as quality of life and environment becomes an ever more important factor in choosing where to live. Wider Devon contains countryside of such exceptional scenic value that around 40% of its area benefits from national landscape protection designation. All landscapes in Devon have distinctive characteristics and qualities that are valued, as indicated by Devon's landscape character assessment [\[See reference 86\]](#).

C.98 Exeter is surrounded by undeveloped hills, ridgelines, that form a distinctive green backdrop to the City, giving Exeter a distinctive character. These 'Landscape Setting Areas', which are defined and protected within the City Council boundary through Local Plan designation, are mainly used for the purposes of agriculture, recreation or forestry. The City is interspersed with green spaces and several designated Valley Parks. The River Exe runs roughly from north to south through the heart of the City and is accompanied by the Riverside Valley Park. Following the course of the River Exe, the relatively flat valley floor leads to the open expanse of the Exe Estuary landscape, which provides a transition between the boundaries of East Devon to the north-east and Teignbridge to the south-west.

C.99 Devon has been divided into unique geographical areas sharing similar character and recognisable at different scales:

C.100 Seven National Character Areas (NCA), named to an area recognisable on a national scale, identified by Natural England. Each National Character Area is further subdivided into:

- 68 Devon Character Areas, named to an area sharing a unique and distinct identity recognisable on a county scale. These areas are further subdivided into:

- 37 Landscape Character Types (LCTs), each sharing similar characteristics. Some types of landscape occur throughout the County, for example, 'sparsely settled farmed valley floors' while others may occur only once or twice, for example, 'upland moorland with tors'.

C.101 A Landscape Sensitivity Assessment [\[See reference 87\]](#) was undertaken in 2022 considering the landscape value of defined areas and their landscape and visual susceptibility to specific types of development. Out of a total of 38 parcels assessed, three parcels were assessed at medium sensitivity, ten parcels for high/medium sensitivity and 35 parcels for high sensitivity to housing development. the sensitivity to employment use is high/medium for three parcels and high sensitivity for 35 parcels.

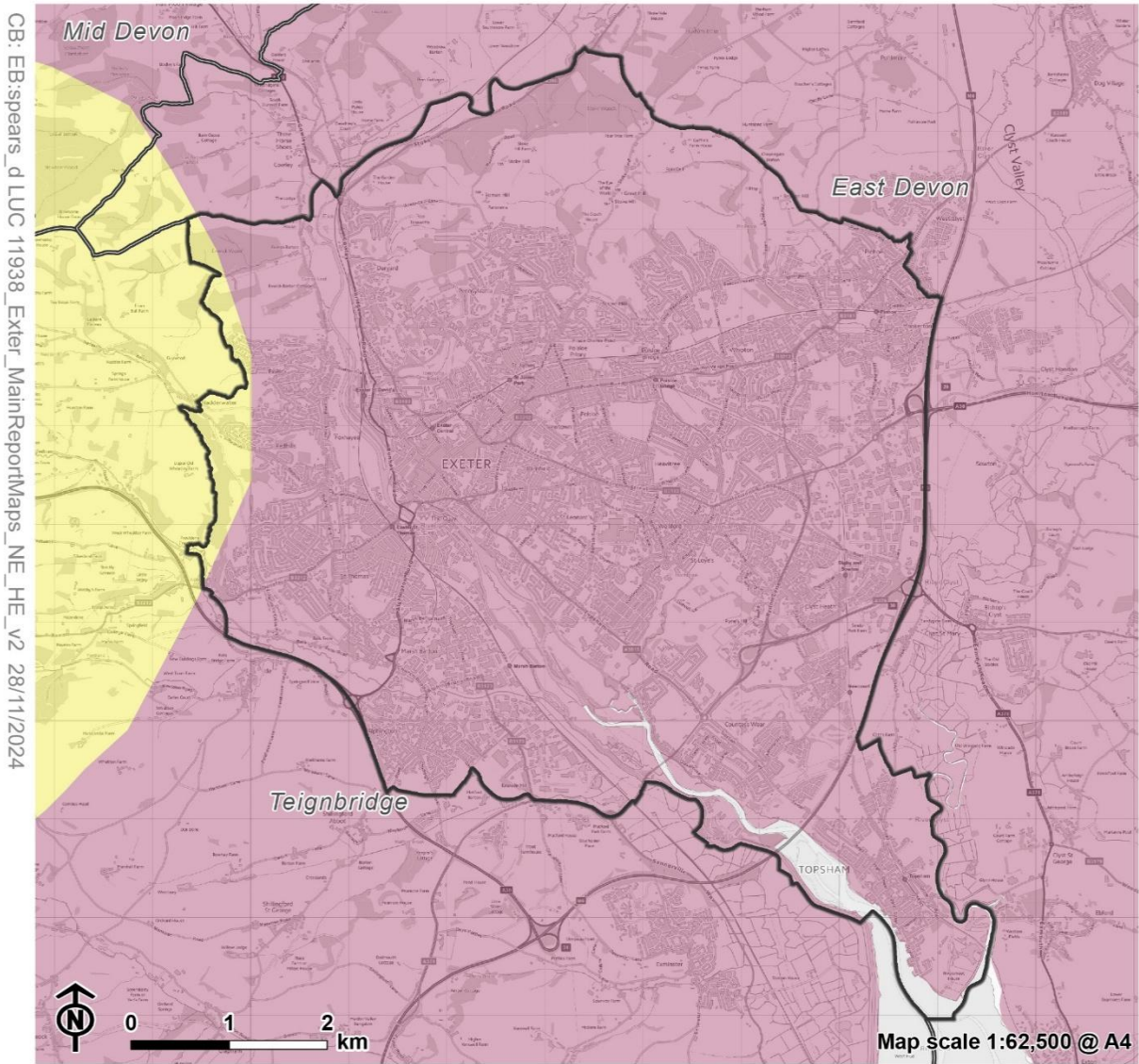
C.102 Exeter is located within the Devon Redlands NCA (148) (see Figure C.8) [\[See reference 88\]](#) which has a very strong, unified character. The underlying red sandstone and consequent red soil dominate the landscape through ploughed fields, cliffs and exposures, and are visually evident in the traditional stone and cob farmsteads, hamlets and villages that are scattered across the area. Not only does the soil visually characterise the area but its fertility also makes it the agricultural heart of Devon. Mixed agriculture has shaped this landscape since medieval times, an era that left a dense pattern of deep and narrow lanes imprinted in the landscape. Land in the west of the NCA rises to the flat, flint-topped Haldon Hills, now mainly under coniferous plantation with some remnant lowland heath. These hills form a prominent landscape feature which is visible across the Redlands and beyond. They provide a distinct landscape setting for Exeter. The character of this part of the NCA is fast changing. Land in the east of the NCA rises to the East Devon Pebblebed Heaths, an area of extensive open access lowland heath [\[See reference 89\]](#).

C.103 Exeter has spread predominantly to the east on undulating land where parts border the low lying Clyst valley. This meets the River Exe just south of Topsham. The River Exe is a broad river of rural character to the north. The Exe floodplain broadens out below the City centre to form a strong green wedge dividing the eastern and western parts of the City. The City centre is focused to the east of the river on rising land. Development west of the river rises up the northern and western slopes visible from the lower parts of the City and is

beginning to spill over the western ridge into the Nadder brook valley. The M5 skirts the City to the south and east providing a significant man-made barrier to the City. Topsham is separated from the City by the motorway and by green fields. There are various green spaces which still penetrate into the City [\[See reference 90\]](#).

C.104 Development runs close to the City boundary on all sides apart from the northern rural hills where the boundary runs over and into the Exe valley to the north. Therefore, there is limited greenfield land left. The hills and river corridors are identified as being of particular importance. The relationship between visual, ecological and historical aspects and their respective values and functions is also emphasised.

Figure C.8: National Character Areas



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Figure C.8: National Character Areas

- Exeter City boundary
- Neighbouring authority

National Character Area

- Devon Redlands
- The Culm

Climate Change

C.105 Climate change presents a global risk, with a range of different impacts that are likely to be felt within Exeter. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year. Higher sea level and increased river flooding are further potential problems. A strong reaction is required from planning to ensure appropriate action can be taken to he, this includes climate change adaptation as well as mitigation.

C.106 The 2018 Intergovernmental Panel on Climate Change (IPCC) identified a reduced timeframe to act to keep world temperatures rises to 1.5 degrees Celsius before 2050 in line with the Paris Agreement [\[See reference 91\]](#).

C.107 The Tyndall Centre has undertaken work to calculate the ‘fair’ contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Exeter [\[See reference 92\]](#):

- Stay within a maximum cumulative carbon dioxide emissions budget of 3.0 million tonnes (MtCO₂) for the period of 2020 to 2100. At 2017 CO₂ emission levels, Exeter would use this entire budget within seven years from 2020.
- Initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -12.3% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2043.

C.108 Exeter City Council has declared a climate emergency and has the ambition to be a net zero carbon City by 2030. The decarbonisation of energy

production is integral to meeting these aims and planning plays a role within this agenda [See reference 93].

Climate Change Predictions

C.109 The latest generation of national climate projections, the UKCP18 resource from the Met Office, provides up to date and robust scientific evidence on projected climate changes. The general climate trend predicted by UKCP18 for the UK is an increased chance of warmer, wetter winters and of hotter, drier summers, along with an increase in the frequency and intensity of extremes. The average temperature between 2011 and 2020 has been 0.5oC warmer than the 1981-2010 average and 1.1oC warmer than 1961-1990. 2023 was the second warmest year on record for the UK in the series from 1884, with only 2022 warmer. Six years in the most recent decade (2014-2023) have been within the top-ten warmest in the series. 2023 was the seventh wettest year on record for the UK in the series from 1836, with 113% of the 1991-2020 average [See reference 94].

C.110 The 2018 State of the Environment Report for Devon outlines that projections for the South West region also suggest warmer, wetter winters and drier, hotter summers. Table C.9 outlines the projected changes in climate for the South West.

Table C.9: Projected changes in climate for the South West under the high emissions scenario (2018 State of the Environment Report)

Year	Likelihood	Winter Mean Temper ature	Summer Mean Tempera ture	Annual Mean Precipit ation	Winter Mean Precipita tion	Summer Mean Precipita tion
2020s	Very likely to be	0.2oC	0.4oC	-3%	-5%	-27%

Year	Likelihood	Winter Mean Temperature	Summer Mean Temperature	Annual Mean Precipitation	Winter Mean Precipitation	Summer Mean Precipitation
	greater than (>)					
2020s	Very likely to be less than (<)	1.8oC	2.2oC	7%	19%	9%
2050s	Very likely to be greater than (>)	0.7oC	1.4oC	-6%	-4%	-49%
2050s	Very likely to be less than (<)	3.7oC	5.1oC	8%	32%	1%
2080s	Very likely to be greater than (>)	1.4oC	2.4oC	-7%	0%	-74
2080s	Very likely to be less than (<)	5.4oC	8.3oC	13%	57%	-5%

Carbon Dioxide Emissions

C.111 Carbon dioxide (CO₂) emissions in Devon have decreased since measurements began in 2005; 2015 CO₂ in Devon was 27% below 2005 levels. CO₂ emissions per person in Devon have followed the same trends in the South West and nationally in England between 2005 and 2010. This is due to improving energy efficiency of buildings and vehicles, and the decarbonisation of the electricity grid nationally.

C.112 The Government regularly publishes Local Authority and regional carbon dioxide emissions national statistics [\[See reference 95\]](#). Emissions for Exeter between 2005-2022 have fallen from 8t per capita to 2.9t per capita. Emissions

in the plan area fell most years between 2005 and 2022 as shown in Table C.10.

Table C.10: Carbon dioxide emissions estimates in Exeter 2005-2022

Year	Total Emissions (kt CO ₂)	Per Capita Emissions (t)
2005	901.9	8.0
2006	706.8	6.2
2007	686.7	6.0
2007	705.0	6.2
2009	627.8	5.5
2010	652.7	5.6
2011	588.5	5.0
2012	636.3	5.4
2013	623.7	5.3
2014	559.9	4.7
2015	596.0	5.0
2016	578.4	4.7
2017	457.5	3.6
2018	459.7	3.6
2019	431.0	3.4
2020	392.7	3.1
2021	413.6	3.2
2022	393.7	2.9

C.113 The greatest drop in carbon dioxide emissions between 2005 and 2022 was in those from commercial sources; whereas transport emissions have seen the smallest amount of change. Agricultural emissions have increased slightly, as shown in Table C.11.

Table C.11: Changes in carbon dioxide emissions by sector for Exeter between 2005 and 2022

Source of Emissions	2005	2022
Industry (kt)	130.8	49.4
Commercial (kt)	226.4	74.8
Public Sector (kt)	178.3	41.1
Domestic (kt)	231.3	116.6
Transport (kt)	131.1	104.9
Agriculture (kt)	2.5	6.0
Grand Total (kt)	901.9	393.7

C.114 In 2022 transport was still the largest source of carbon dioxide in the UK, accounting for 30.5% of total end-user greenhouse gas emissions. National transport greenhouse gas emissions saw a decrease of 8.4% in 2021 compared to 2020, however this was largely due to the impact of COVID-19 as people were instructed to stay at home. Prior to the large fall in 2020, national transport emissions had only decreased slightly since 2005. The majority of emissions from transport in the UK are from road transport [\[See reference 96\]](#). Transport emissions include freight and passenger transport, both for private and business purposes. CO₂ emissions in Devon are dominated by transport emissions (55%), which have become more dominant in recent years as improvements to domestic and industrial energy efficiency and decarbonisation have been more successful than decarbonising transport.

C.115 Since 2005, total vehicle distance travelled in Devon has increased from approximately 7,700 to 8,300 million kilometres, which is an increase of around 8%. This broadly reflects the national trend, which has seen travel distances rise.

C.116 The move towards electric vehicles is aimed at helping the reduction in transport emissions. The national target is for 60% of all new cars and vans to be electric by 2030. As of April 2023, there were 40,150 public electric vehicle charging devices available in the UK and of these, 7647 were rapid charging devices [See reference 97]. Within Exeter, there are a total of 104 public electric vehicle charging devices of which 27 are rapid charging devices. This equates to 80.4 public electric vehicle charging devices per 100,000 population in Exeter and 20.9 rapid charging devices per 100,000 population. Exeter performs better than the UK averages of 55.3 public electric vehicle charging devices per 100,000 population and 10.3 rapid charging devices per 100,000 population.

Overall Energy Consumption

C.117 The Department for Business, Energy and Industrial Strategy produced the following consumption figures for Exeter in 2021 [See reference 98]:

- All fuels – A total of 156.3Ktoe across domestic, transport and industrial and commercial use.
- Coal – A total of 0.1Ktoe predominantly through industrial and commercial use.
- Manufactured fuels – A total of 0.2Ktoe through domestic and industrial and commercial use.
- Petroleum – A total of 39.1Ktoe predominantly from road transport.
- Gas – A total of 69.6Ktoe predominantly through domestic use.
- Electricity – A total of 44.2Ktoe through domestic and industrial and commercial use.

- Bioenergy and wastes – A total of 3.1Ktoe predominantly through industrial and commercial use.

C.118 The changes in consumption by energy type for Exeter are shown in Table C.12. With the exception of energy from bioenergy and wastes, the consumption of all energy types fell between 2005 and 2021.

Table C.12: Energy consumption in Exeter by type

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2021)
Coal	0.5	0.1
Manufactured Fuels	0.8	0.2
Petroleum	39.2	39.1
Gas	187.1	69.6
Electricity	50.9	44.2
Bioenergy and Wastes	2.2	3.1
Total	280.7	156.3

Flood Risk

C.119 Exeter City Council prepared a Strategic Flood Risk Assessment (SFRA), Level 1 published in 2008 and Level 2 in 2014 [\[See reference 99\]](#). The Level 1 assessment provides general guidance about areas where potential flood risk is an issue. The Level 2 assessment includes specific assessments in areas of higher flood risk and reduces uncertainty by increasing the quality and quantity of data to allow the application of the Exception Test. In 2024, an updated Strategic Flood Risk Assessment [\[See reference 100\]](#) has been prepared. The Level 1 Report evaluates flood risks within the area, offering data and analysis

to guide development planning. The report assesses flood sources, historical events, and future projections, providing flood maps and risk zones.

C.120 Exeter is located immediately at the head of the tidal influence of a major river catchment, the River Exe, into which many smaller rivers or rivulets and tributaries discharge into upstream from the source on Exmoor in North Devon. The main river system in Exeter has a natural flood plain which generally extends south-westwards. The Exeter Strategic Flood Risk Assessment [\[See reference 101\]](#) outlines the key sources of potential flood risk within Exeter. This includes:

- Exeter is located immediately at the tidal limit of the River Exe. The River Exe has a natural floodplain which extends south westward into areas of lower Exwick, St Thomas and Marsh Barton. Other areas at risk of flooding from the River Exe include the lower part of St Davids and Exeter Quay.
- The tidal influence of the River Exe has implications for low lying areas to the south of the city including Countess Wear and Topsham. The predicted impact of sea level rise is anticipated to cause significant increases to extreme high water levels in tidal areas and the potential for associated flooding.
- Many of the watercourses that eventually discharge into the River Exe have their own localised flood risk issues: Alphinbrook; Matford Brook; Northbrook; Pinbrook; Taddiforde Brook, Larkbeare Culvert, and Longbrook Culvert.
- Surface water flooding is a risk across much of the urban area of Exeter city.
- There is a potential risk of flooding from groundwater although the natural groundwater table generally remains fairly constant.

C.121 Sewer flooding is a risk in some areas of the city, typically in the older parts of the city which are still served by Combined Sewers with limit capacity, or where historic watercourse catchments have been covered over and drained by sewers with are exceeded in extreme rainfall.

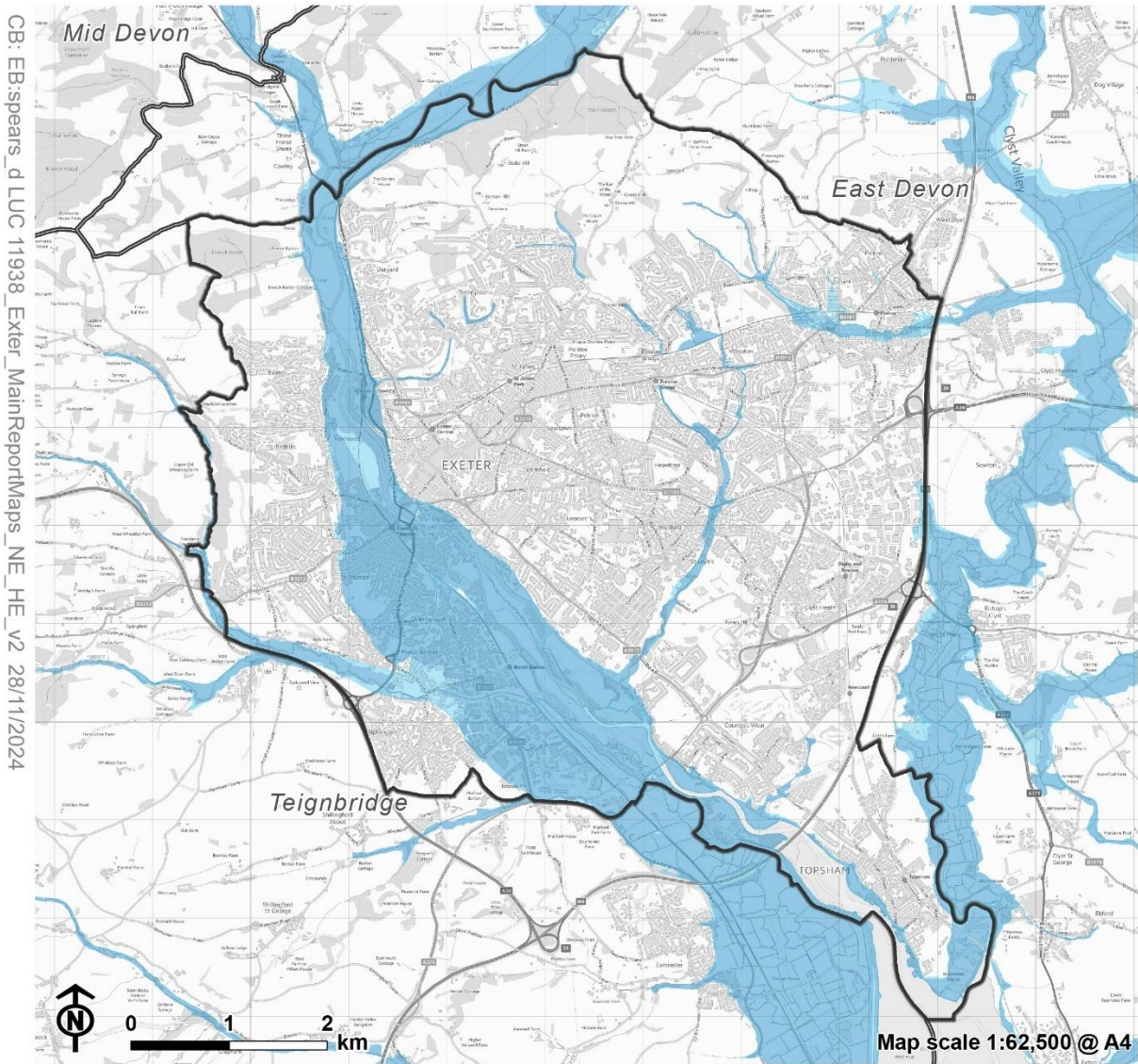
C.122 The extent of flood risk zones are shown in Figure C.9, which shows all areas within flood zones 2 and 3.

C.123 The Environment Agency completed the Exeter flood defence scheme in 2022 which has reduced flood risk in association with the River Exe for more than 3,000 homes and businesses. No land has been identified as being required for future flood risk management within Exeter City. The Level 2 report is still to be undertaken which will consider the impacts of climate change on flood risk within Exeter city [\[See reference 102\]](#) .

C.124 Surface water flooding also presents risks and the increase in impermeable surfaces over the years has contributed to additional surface water runoff, increasing the catchment response to rainfall. Legislation is now in place to ensure that flood risk is managed as a result of new development and to provide betterment where possible. Sustainable drainage systems (SuDS) help manage surface water.

C.125 Devon County Council are the Lead Local Flood Authority as defined by the Flood and Water Management Act 2010 and are responsible for managing local flood risk in Devon (i.e. risks of internal property flooding from surface water, ground water and ordinary (smaller) watercourses). This excludes flood risk from the sea and main rivers, which is the Environment Agency's responsibility).

Figure C.9: Flood zones



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Figure C.9: Flood Zones

- Exeter City boundary
- Neighbouring authority

Flood Zones

- Flood zone 2
- Flood zone 3

Renewable Energy

C.126 The provision of renewable energy is an important element of addressing climate change and Devon is rich in renewable energy resources.

C.127 Exeter has increased its capacity to generate electricity from renewable sources from 2014 to 2022 from 7.4MW installed capacity to 21.1MW installed capacity [\[See reference 103\]](#). Capacity for solar power has accounted for most of the installed renewable energy capacity in Exeter during this period. This is emphasised by the Exeter Authority Monitoring Report 2022/23, which states that:

- Small scale renewable energy installations, such as domestic rooftop photovoltaic arrays, have come forward in the City.
- Water Lane Solar Park, Marsh Barton: This 1.2 MW ground mounted solar array and battery storage facility was completed in 2022 to provide a renewable energy supply to the City Council's nearby recycling centre in Exton Road and to power the City Council's electric fleet of vehicles.
- Exeter City Council generates 2.14MW of renewable energy on city council land and the Riverside Leisure Centre.

C.128 Energy generation from renewable sources also increased in Exeter during the period 2014 to 2022 from 8,216MWh in 2014 to 13,049MWh.

C.129 Exeter's potential for wind and solar energy report [\[See reference 104\]](#) identified that the majority of renewable energy potential comes from photovoltaic arrays with a potential generation of 17.9MWp. these areas are largely located within the periphery of the City. Only one wind turbine site has been identified to the north of Exeter and its potential contribution is small at 0.5 to 1.0 MWp capacity.

Pollution

Air Quality

C.130 The Environment Act 1995 introduced the National Air Quality Strategy and the requirement for local authorities to determine if statutory air quality objectives (AQOs) are likely to be exceeded. All local authorities now report to DEFRA on an annual basis and have the obligation to declare Air Quality Management Areas (AQMAs) and develop action plans for improvement of air quality if objectives are likely to be exceeded.

C.131 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas. DEFRA published its Clean Air Strategy in 2019, which identifies air pollution as the top environmental risk to human health in the UK, making us more susceptible to other illnesses. The strategy recognises that air pollution can be caused not only by emissions from road transport and burning fossil fuels, but also by intensive agricultural food production and heating our homes. It sets out a range of practical actions to reduce emissions.

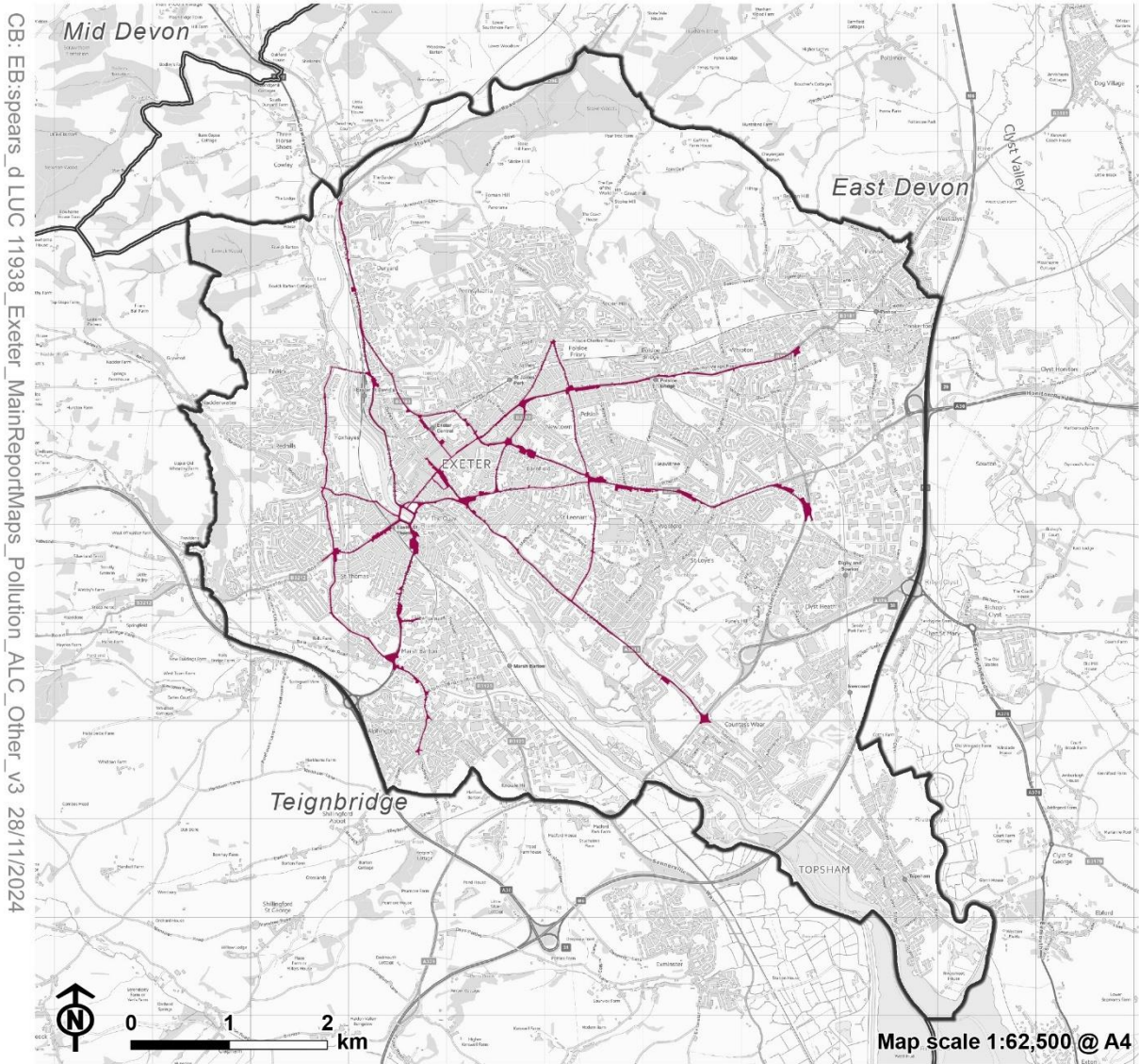
C.132 Exeter has one AQMA covering the main traffic routes in the City (see Figure C.10). The location of the AQMA shows that it is associated with vehicle emissions which cause levels of nitrogen dioxide to exceed the health based annual mean air quality objective for residential properties. Exeter City Council has a monitoring network that is designed to identify the areas with the highest levels of nitrogen dioxide, at the locations where the AQOs apply. Most of the monitoring sites are therefore on residential properties in close proximity to the busiest roads and junctions in the City. The results of the monitoring conducted by the City Council is not generally representative of typical or average

conditions across the City. Instead it is indicative of the worst case locations [\[See reference 105\]](#).

C.133 Nitrogen dioxide levels in Exeter at most monitoring sites have fallen since a peak in 2009 but have been broadly stable. 2020 was exceptional, as the reduction in traffic flows as a result of COVID-19 led to a significant fall in nitrogen dioxide concentrations at all monitoring sites. The 2023 Air Quality Annual Status Report identified that Nitrogen dioxide levels in Exeter in 2022 were generally below those measured in 2021. East Wonford Hill was the only location where levels of NO₂ exceeded the air quality objective. There were no measured exceedances of the PM₁₀ air quality objectives in Exeter in 2022 [\[See reference 106\]](#).

C.134 Outside of the AQMA, although air quality may be within legal limits, there is still concern present in relation to air quality, particularly in urban areas as a result of road congestion.

Figure C.10: Air Quality Management Area



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Figure C.10: Air Quality Management Area

- Exeter City boundary
- Neighbouring authority
- Air Quality Management Area

Noise Pollution

C.135 Noise is a common problem arising from transport as well as other sources. Noise has been proven to have a major negative direct and indirect effects on health and well-being, on quality of life and on wildlife. Noise can cause a number of health problems, mainly linked to stress and lack of sleep. The European Commission estimates that 90% of background noise comes from road traffic. This has been shown by recent noise mapping exercises in Birmingham and London where the contours showing significant levels of noise closely follow the road networks. It is likely that with rising car ownership this will increasingly be an issue that transport has to address. There is scope for transport's noise emissions to be reduced including through reducing the number of cars on the road, by installing low noise road surfacing and noise barriers.

C.136 Noise pollution levels are generally average for the size of Exeter, with noise pollution not appearing to be a major problem. A large proportion of the total noise complaints received by Exeter's Environmental Health Department involved noise from residential properties. Exeter Airport creates local issues that are experienced around the Sowton Industrial Estate to the east of the City Centre, although the worst impacts are experienced in East Devon. Noise is also produced by traffic on the M5.

Light Pollution

C.137 Light pollution is essentially unwanted artificial light and comes in the following forms:

C.138 Light trespass: The intrusion of light into homes.

- Glare: Unshielded bright lighting may be hazardous in a relatively small area.

- Sky Glow: The broad orange glow that prevents appreciation of the night sky.

C.139 As well as destroying a view of the night sky, light pollution wastes energy and harms people's quality of life at night through interference with sleep. Light pollution also has an ecological impact.

C.140 Devon has one of the largest percentages of land area minimally or unaffected by light pollution in the country. The Campaign to Protect Rural England (CPRE) has fought for the protection and improvement of dark skies and against the spread of unnecessary artificial light. Maps of Great Britain's light pollution and dark skies were created using data captured by a satellite at 1.30am throughout September 2015, to give an accurate picture of how much light is spilling up into the night sky. Only 22% of England has pristine night skies, which we consider as completely free of light pollution. Devon has 56% of its night skies in the darkest colour band and 82% in the darkest two categories, therefore, free of light pollution [\[See reference 107\]](#).

C.141 The latest light pollution map for Exeter City shows that it has greater levels of light pollution than other Districts in Devon and is the 243rd darkest District out of 326 within England. The majority of the District is comprised of areas in the 2nd and 3rd brightest light categories and 9.5% of the District is within the brightest light category.

Natural Resources

Geology and Minerals

C.142 Devon's diverse geology is reflected in the range of mineral resources that are worked in the County, including industrial minerals of national importance, construction aggregates, building stone and chalk. These different minerals are worked by different methods and on widely varying scales. While some mineral resources benefit from adequate reserves to enable their

continued working others such as sand and gravel and ball clay require provision for delivery of further resources.

C.143 The Devon Minerals Plan provides the policy framework for decisions by Devon County Council on planning applications for mineral development over the period to 2031, together with decisions on non-mineral development by other planning authorities that may affect mineral resources. The vision of the Devon Minerals Plan envisages Devon continuing to meet its aggregates needs, including maximising the use of its secondary and recycled materials, while contributing to the local and wider economies through supply of nationally important industrial minerals.

C.144 When the previous Devon County Minerals Local Plan was adopted in 2004, the County had sufficient reserves of all mineral resources then being worked for the Plan's period to 2011. The Local Plan also took a relatively narrow approach to the protection of mineral resources and transportation infrastructure. However, the adopted Minerals Local Plan states the need to identify additional mineral resources due to the limited quantity of remaining reserves with planning permission. In addition, the evolution of national minerals policy with publication of the National Planning Policy Framework has brought new concepts such as Local Aggregate Assessments and Mineral Safeguarding Areas to which Devon County Council had to respond to.

C.145 The different minerals that are, or have potential to be, worked in Devon can be considered in four main groups:

- Nationally important industrial minerals, comprising ball clay from the Bovey and Petrockstowe Basins, china clay at Lee Moor and metalliferous minerals, notably the tungsten and tin deposit at Drakelands;
- Aggregates, including land-won resources from hard rock and sand and gravel, together with secondary and recycled aggregates that utilise the by-products arising from mineral and other activities;
- Building stone, with only a small proportion of the wide range of stones used in Devon now being worked; and

- Other minerals including chalk, clay for use in the manufacture of bricks and pottery, and the limited potential for energy minerals [\[See reference 108\]](#).

C.146 The Devon Local Aggregate Assessment conducted between 2022 and 2023 details the current and predicted supply of aggregates to meet expected need. The three year average for crushed rock and sand and gravel remain below the ten years sales averages for the third consecutive year. Although it has decreased, the landbank for crushed rock remains well above the minimum levels required by the NPPF. However, the landbank for sand and gravel continued to fall below the 7-year minimum requirement. Sales of secondary aggregates have decreased by approximately 7% in 2022 from the previous year [\[See reference 109\]](#).

C.147 Policy M12: Land-won Sand and Gravel Supply, included in the adopted Minerals Local Plan, makes allowance for small-scale supply of sand and gravel from the Exeter area, which will assist in conserving the Budleigh Salterton Pebble Beds resource while also reducing transportation distances by encouraging local supply. Supply from Exeter is most likely through extension of an existing quarry, although there is scope for establishment of new sources, including through prior extraction at development sites in accordance with Policy M3.

C.148 The adopted Minerals Local Plan also includes Mineral Safeguarding Areas and Mineral Consultation Areas which aim to secure valuable mineral resources and facilities from sterilisation by new development, to ensure that they remain available for us by future generations and operations. Some of these Areas are designated within Exeter, including north of Exeter St Davids train station, the south-west in the trading estates near Marsh Barton and Matford, and to the east of the City Centre in Middle Moor.

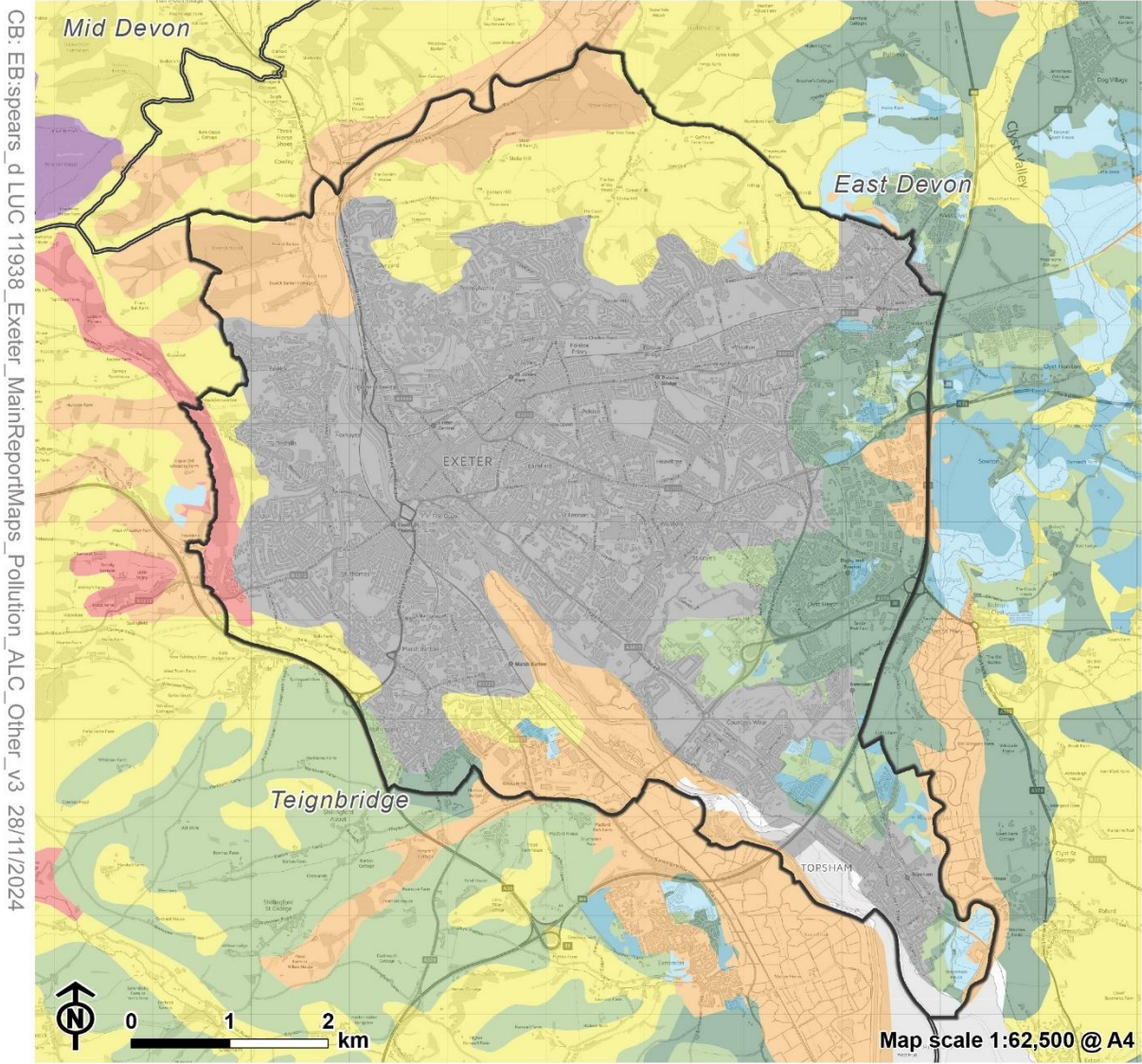
Soils

C.149 The Agricultural Land Classification (ALC) system provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations on agricultural use. The principal factors influencing agricultural production are climate, site and soil. These factors, together with interactions between them, form the basis for classifying land into one of five grades, where Grade 1 describes land as excellent (land of high agricultural quality and potential) and Grade 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside of these scores is deemed to be 'primarily in non-agricultural use', or 'land predominantly in urban use'.

C.150 The main threats to soil quality in Devon relate to land in natural, countryside or agricultural uses, and include erosion by flooding and surface water runoff, intensive cultivation, poor forestry practice and trampling by grazing animals. These threats fall largely outside of the control of the planning system. However, urbanisation is clearly a planning matter as development in general can result in loss of or damage to soil.

C.151 Exeter is mainly comprised of freely draining and slightly acid loamy soils, the most common across Devon. The majority of land within Exeter City is classed as in urban use. However, there are small bands across the north of Exeter City of Grades 3 and 4, and small areas in the south-east of Grades 1 and 2 (see Figure C.11). There are some areas of Exeter where more detailed ALC mapping has been undertaken which distinguishes between Grades 3a and 3b (see Figure C.11).

Figure C.11: Agricultural Land Classification



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Figure C.11: Agricultural Land Classification

- Exeter City boundary
- Neighbouring authority

Agricultural Land Classification

- Grade 1 (Excellent)
- Grade 2 (Very good)
- Grade 3 (Good to moderate)
- Grade 3a (Good quality)
- Grade 3b (Moderate quality)
- Grade 4 (Poor)
- Grade 5 (Very poor)
- Non Agricultural
- Urban

Contaminated Land

C.152 In accordance with Section 78R of the Environmental Protection Act 1990, the Council is required to maintain a public register of contaminated land, which serves as a permanent record of all regulatory action undertaken to ensure remediation of any site that has been classified as contaminated.

C.153 Many areas of land become contaminated by residues left behind by activities such as mining, waste disposal and general industrial processes. Until the contamination is treated the land may be severely restricted in how it may be used in the future. Since 2001, 1300 sites have been identified in Exeter City where there may be contamination sources, through strategic inspection [\[See reference 110\]](#). However, no sites in Exeter have been formally determined to be Contaminated Land under part 2A of the Environmental Protection Act 1990. Known former land uses that have potential to cause contamination include: gasworks, slaughterhouses, brickworks, foundries, railway land, landfill sites, tanneries, MOD land, sewage treatment plants, petrol filling stations and timber treatment yards.

Water

C.154 Adequate quantity, quality and timing of water flows is required to sustain ecosystems and the valuable services they provide for us, such as clean water and food. Beyond providing vital nutrients and hydration for wildlife, the water environment regulates erosion, pollution and flooding. Our waterbodies have aesthetic, cultural and historical values central to Devon's heritage as agricultural and seafaring communities and as tourism destinations.

C.155 The major river running through Exeter is the River Exe. The headwaters of the Exe lie in the Exmoor National Park. From its source at Exehead, the river flows across the moorland and passes across the rural Exe valley landscape, through the heart of Exeter and reaches the sea at Exmouth.

Water Quality

C.156 The main reasons for poor groundwater chemical status are high or rising nitrate concentrations, with some failures for pesticides and other chemicals. Parts of Exeter and neighbouring authorities have been designated as Nitrate Vulnerable Zones (NVZs). Within these areas, farmers are required to follow mandatory rules to tackle nitrate loss from agriculture. Figure C.12 displays the nitrate vulnerable zones within Exeter and surrounding areas.

C.157 The rivers, floodplains and wooded banks are important for a number of key species such as otters, bats, Atlantic salmon, brown trout, dipper, white clawed crayfish, pearl mussels, mosses, ferns and rare invertebrates. A surface water's overall quality is assessed as a combination of its ecological and chemical quality. The main river in the plan area is the Exe. Adequate quantity, quality and timing of water flows is required to sustain ecosystems and the valuable clean water it provides.

C.158 The European Water Framework Directive (WFD) objectives are to prevent deterioration of waterbodies and to improve them such that they meet the required status for that given waterbody (rivers, lakes, estuaries, coastal and groundwaters).

C.159 The ecological status or potential for surface freshwaters, estuaries and coastal water bodies varies across Devon. In the most part, surface water quality is moderate to good across Devon, with a small incidence of poor quality affecting parts of the Exe Estuary. Common reasons for less than good status include impacted fish and diatom (algae) communities; physical modification; high levels of copper and zinc, which can be linked to natural geology and historic mining activity, and phosphate, which can be linked to fertilisers used in farming. Other impacts on water quality may come from pollution from road run-off, and overflow of sewage from combined sewerage systems after from heavy rain.

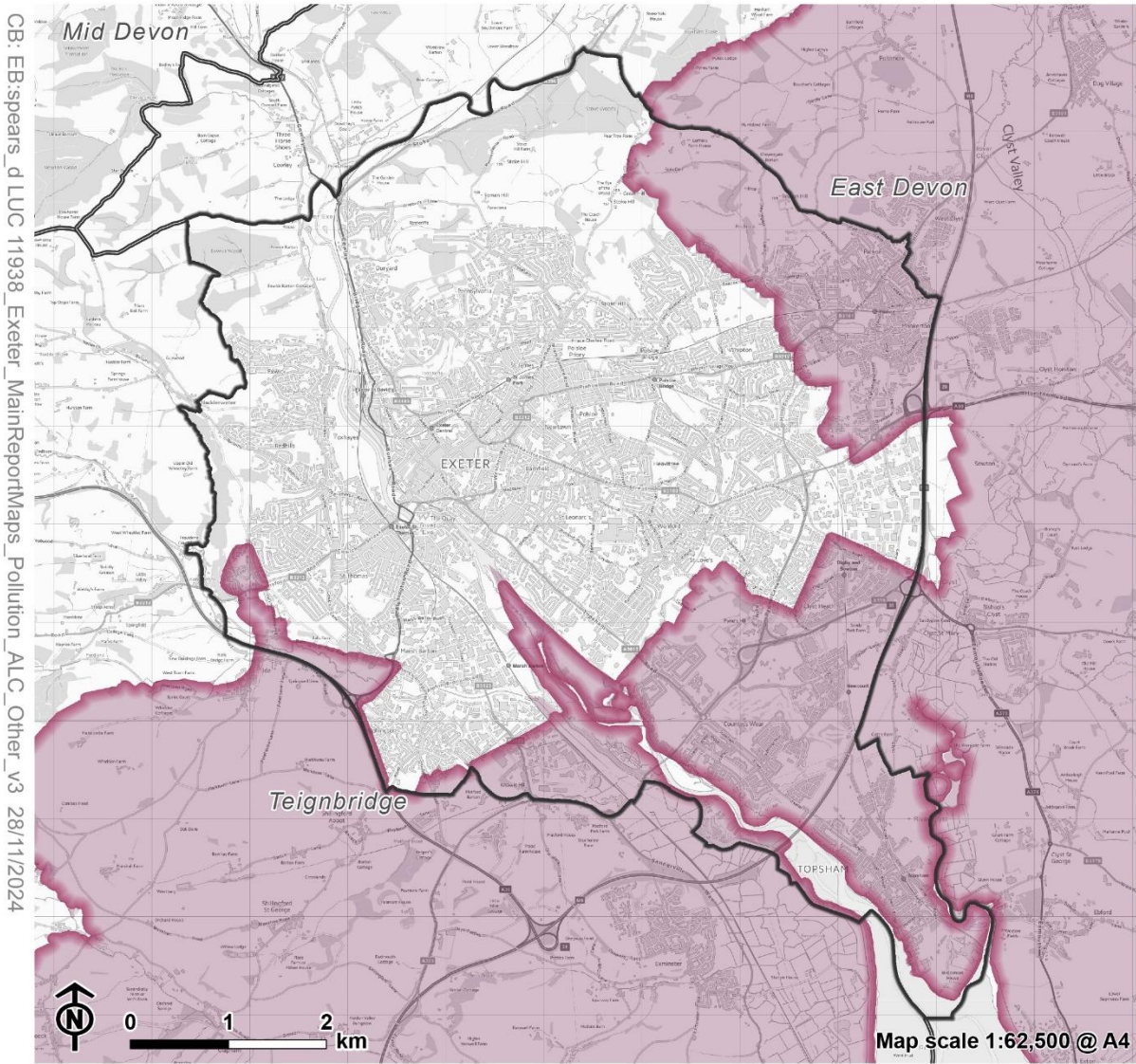
C.160 Key water bodies within and downstream of Exeter, with their current ecological status are [\[See reference 111\]](#):

- North Brook – Moderate Ecological Status
- River Exe (Creedy to Estuary) – Moderate Ecological Status
- Alphin Brook – Good Ecological Status
- Matford Brook – Moderate Ecological Status
- Upper Clyst – Moderate Ecological Status
- Lower Clyst – Moderate Ecological Status
- Exe estuary – Moderate Ecological Status

C.161 The target for water bodies is to achieve Good Ecological Status by 2027.

C.162 Groundwater quality varies across Devon. The majority of the county has poor chemical status with pockets of good. Generally in Exeter and neighbouring authorities, groundwater sources such as springs, wells and boreholes are limited and account for only about 10% of water supplies. These are located mainly in East Devon, and there are therefore a very small number of source protection zones in Exeter City. Surface water sources therefore provide the majority of the supply from reservoirs and river intakes. The most significant reservoir for supply of drinking water is Wimbleball for Exeter. Drinking Water Safeguard Zones have been designated where the land use is causing pollution of the raw water. This affects the River Exe catchment between Exeter and Oakfordbridge which is at risk from pesticides. Groundwater bodies that fall into this category are near Kenton and between Ottery St Mary and Otterton [\[See reference 112\]](#). Human health is not at risk from these sources because Southwest Water provide extra treatment.

Figure C.12: Nitrate Vulnerable Zones



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Figure C.12: Nitrate Vulnerable Zones

- Exeter City boundary
- Neighbouring authority
- Nitrate Vulnerable Zones

Nitrate Vulnerable Zones (NVZ) 2021 Designations:
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Waste

C.163 The Devon Waste Plan 2011-2031 (adopted 2014) provides the policy framework for decisions by Devon County Council on planning applications for waste management development over the period to 2031. Devon's households (373,000 tonnes) and businesses (455,000 tonnes) generate broadly similar levels and types of waste, but their combined waste is exceeded by that from construction, demolition and excavation activity (1.2 million tonnes). There has been a strong shift away from landfilling of this waste towards recycling, with households and businesses now recycling around 55% of their waste. In 2011, approximately 81,000 tonnes of material was composted at facilities in Devon. Policy W5: Reuse, Recycling and Materials Recovery of the Devon Waste Plan aims for increased recycling levels of at least 64% for household and business waste and 90% for construction and demolition waste by 2031.

C.164 Hazardous wastes such as highly flammable solvents, toxic and corrosive substances, present a significant risk to human health and wildlife. Devon produced small quantities of hazardous waste at 37,000 tonnes in 2011, with this level predicted to gradually increase. Over 70% of this waste is treated or disposed of outside Devon due to its specialist requirements, although Devon has some hazardous waste facilities that manage some of the county's waste along with materials from other areas [\[See reference 113\]](#).

C.165 Devon has made significant progress with its waste management since the early 90s when the recycling rate was 2%, reaching a recycling rate of 56.6% in 2019/20 [\[See reference 114\]](#). Household waste growth is also being held at -0.3%.

C.166 Exeter has the lowest waste arising per head (kg) in Devon at a total of 283kg per head in 2022/23, which is amongst the lowest in the Country. However, Exeter has the lowest recycling rate in Devon, with a rate of 24.5% in 2022/23 compared to East Devon at 59.5%. Exeter's low recycling performance is stated to need attention. Exeter was the highest performing Devon authority in 1995 at 8.2% and achieved its highest ever rate in 2010 (36.9%). However, as other authorities introduced separate food waste collections and rolled out

new services this peak performance has suffered in comparison, with rates reducing annually to its 2022/23 position of 24.5%. In 2018/19 DEFRA statistics positioned Exeter as the 13th lowest performing Waste Collection Authority in England out of 222 similar authorities. Despite these challenges, Exeter has ambitious plans to introduce kerbside food and glass collections, which will also enable a reduction in residual waste collection frequency, further boosting recycling participation and performance [See reference 115] [See reference 116].

Difficulties and Data Limitations

C.167 The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

“...description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

C.168 At this stage, given the content and purpose of the SA Scoping Report, it is considered appropriate to report on the data limitations identified as the report was prepared:

- There is limited information on up to date business stock levels, and retail occupancy and vacancy rates;
- Housing stock data is based on Exeter Housing Market Area Strategic Housing Market Assessment undertaken in 2014/15;
- The latest Green Infrastructure Study was produced in 2009;
- The majority of data available on agricultural land quality does not distinguish between Grade 3a and Grade 3b; and

- Apart from sampling point data [\[See reference 117\]](#); an up to date summary of water quality for Exeter, particularly for the River Exe, has not been found.

C.169 Where data limitations have been identified, if relevant updates sources become available at a later stage of the SA process, they will be used to update the baseline evidence for the appraisal work.

Appendix D

Site Assessment Criteria

Assumptions Regarding Distances

D.1 A number of the appraisal assumptions presented in this appendix refer to accessibility from site options to services, facilities, employment etc. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation [\[See reference 118\]](#) categorises distances depending upon location and purpose of the trip, and ‘desirable’, ‘acceptable’, and ‘preferred maximum’:

- Town centres:
 - Desirable – 200m
 - Acceptable – 400m
 - Preferred maximum – 800m
- Commuting/School/Sight-seeing:
 - Desirable – 500m
 - Acceptable – 1,000m
 - Preferred maximum – 2,000
- Elsewhere:
 - Desirable – 400m
 - Acceptable – 800m
 - Preferred maximum – 1,200m

D.2 For the purposes of the appraisal, distances in the appraisal have been measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route).

D.3 It is recognised that many journeys to services and facilities will not be made in a straight line. When applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances a 10% buffer has therefore been applied to account for the potential difference between the straight line distance and the actual distance involved in a journey to services and facilities. For example, the relevant distance applied for walking distance for town and local centres has been decreased from 800m to 720m, and so on.

D.4 It is considered that this is a reasonable approach, and professional judgement will be used when applying these distances to each site option and the range of services and facilities considered by the appraisal (e.g. where there are significant barriers to straight-line movement, such as railway lines). The distances used in the appraisal will vary depending upon the type of destination being accessed and the mode of transport:

- 450m walking distance for primary schools on the basis that parents with young children are unlikely to want long distances with young children;
- 900m walking distance for secondary schools;
- 720m walking distance for town and local centres;
- 450m to a bus stop, as many people are unlikely to want to walk much further and then catch a bus to their destination;
- 1,800m walking distance to a train station; and
- In terms of access to cycle route, a distance of 450m will be used in the appraisal on the assumption that links to cycle routes are likely to use road carriageways.

SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change

All Development Site Options

D.5 The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under SA objective 8 below. The likely effects of all site options on this objective are therefore negligible (0).

SA Objective 2: To provide a suitable supply of high quality housing including an appropriate mix of types and tenures

Residential Site Options

D.6 All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. Larger residential sites will make a bigger contribution to the total housing requirement of Exeter City. Therefore, sites that would deliver 100 or more homes will have a significant positive effect (++) and sites that would deliver fewer than 100 homes will have a minor positive effect (+).

Mixed Use Site Options

D.7 It is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for mixed use sites that will comprise 100 dwellings or more. Any mixed use sites that comprise of less than a 100 dwellings will score minor positive effect (+?). However the positive effects will be uncertain depending on how much of the site is used for residential development as opposed to other uses.

Employment Site Options

D.8 The location of employment sites is not considered likely to affect this objective; therefore the effect for all employment and retail site options will be negligible (0).

SA Objective 3: To support the sustainable and diverse growth of the City's economy and maximise employment opportunities

Residential Site Options

D.9 The location of residential sites within the City will not directly influence sustainable economic growth or the delivery of employment opportunities. Therefore a negligible (0) effect is expected for these types of site options in most cases.

D.10 However, consideration needs to be given to potential negative impacts resulting from the conversion of existing employment uses to residential. An

employment land study has been produced to support the Local Plan which rates existing employment sites across the City in terms of their suitability for employment (green being a good site for employment and red being poor). The following will be applied to proposed sites where they coincide with sites included within this study:

- If a site is identified in the Exeter Employment Land Study as green then a significant negative effect is likely (--?). This is uncertain as it is unknown how much of the existing employment uses are to be retained.
- If a site is identified in the Exeter Employment Land Study as yellow then a minor negative effect is likely (-?). This is uncertain as it is unknown how much of the existing employment uses are to be retained.
- If a site is identified in the Exeter Employment Land Study as red then a negligible effect is likely (0?). This is uncertain as it is unknown how much of the existing employment uses are to be retained.

Mixed Use Site Options

D.11 All of the mixed use site options are expected to have positive effects on the element of this objective relating to the growth of the City's economy, as it is assumed that all mixed use site options will incorporate some element of employment generating uses. Therefore, mixed use site options could affect the employment opportunities element of this objective.

- Sites that are proposed solely for employment uses are likely to have a significant positive effect (++).
- All other mixed use sites are likely to have a minor positive effect (+).

D.12 Consideration needs to be given to potential negative impacts resulting from the conversion of existing employment uses to residential. An employment land study has been produced to support the Local Plan which rates existing employment sites across the city in terms of their suitability for employment (green being a good site for employment and red being poor). The following will

be applied to proposed sites where they coincide with sites included within this study, which could lead to mixed effects overall:

- If a site is identified in the Exeter Employment Land Study as green then a significant negative effect is likely (--?). This is uncertain as it is unknown how much of the existing employment uses are to be retained.
- If a site is identified in the Exeter Employment Land Study as yellow then a minor negative effect is likely (-?). This is uncertain as it is unknown how much of the existing employment uses are to be retained.
- If a site is identified in the Exeter Employment Land Study as red then a negligible effect is likely (0?). This is uncertain as it is unknown how much of the existing employment uses are to be retained.

Employment Site Options

D.13 The provision of new employment sites is likely to have a positive effect on this objective by ensuring that new job opportunities are provided to match the population growth that will result from housing development through other residential site allocations. Furthermore, the provision of new employment sites is likely to have a positive effect on this objective by providing new and modern developments in which businesses can locate.

D.14 An employment land study has been produced to support the Local Plan which scores employment sites across the City in terms of their suitability for employment (green being a good site for employment and red being poor). The following will be applied to proposed sites where they coincide with sites included within this study:

- If a site is identified in the Exeter Employment Land Study as green then a significant positive effect is likely (++). This is uncertain as it is unknown how much of the existing employment uses are to be retained.
- If a site is identified in the Exeter Employment Land Study as yellow then a minor positive effect is likely (+). This is uncertain as it is unknown how much of the existing employment uses are to be retained.

SA Objective 4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities

Residential and Mixed Use Site Options

D.15 Residential sites and mixed use sites incorporating residential development that are within close proximity of existing healthcare facilities (e.g. GP surgeries) will ensure that residents have good access to healthcare services. If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities. For the purposes of this assessment, a threshold of 1000 homes has been applied, as above that number there will likely be a requirement to secure a new healthcare facility.

D.16 Public health will also be influenced by the proximity of residential and mixed use sites to open spaces, walking and cycle paths, recreation and sports facilities, easy access to which can encourage participation in active outdoor recreation. Employees working within mixed use sites may also be more able to commute via active modes and make use of open spaces during breaks.

D.17 Therefore:

- Sites either above 1000 homes or that are within 720m of a healthcare facility and an area of open space/sports facility will have a significant positive (++) effect.
- Sites under 1000 homes that are within 720m of either healthcare facility or an area of open space/sports facility (but not both) will have a minor positive (+) effect.

- Sites under 1000 homes that are not within 720m of either a healthcare facility or an area of open space/sports facility will have a minor negative (-) effect.

Employment Site Options

D.18 Employment sites that are within walking distance (720m) of existing open spaces, footpaths and cycle routes will ensure that employees have good access to walking and cycle links which may encourage them to commute on foot or by bicycle and to be active outdoors in open space during breaks from work, thus promoting healthy lifestyles.

- Sites that are within 720m of an area of open space and at least one footpath/cycle path will have a significant positive (++) effect.
- Sites that are within 720m of either an area of open space or footpath/cycle path will have a minor positive (+) effect.
- Sites that are more than 720m from either an area of open space or footpath/cycle paths will have a minor negative (-) effect.
- If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility it is recognised that that this use may be lost as a result of development. As such where site options contain such features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++)/--?) or (+/--?) effect.

SA Objective 5: Promote high quality design in new development and improve the character of the built environment

All Development Site Options

D.19 The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The likely effects of all site options on this objective are therefore negligible (0).

SA Objective 6: To support community cohesion and safety

All Development Site Options

D.20 The effects of new development on safety, including levels of crime and fear of crime, will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the policies in the new Local Plan and detailed proposals for each site).

D.21 Achieving regeneration through new development may help to promote a sense of ownership and community cohesion among residents. It is recognised that this will depend in part on the detailed proposals for sites and their design, which are not known at this stage. However, the location of new developments

will affect social deprivation and economic inclusion by influencing how easily people are able to access job opportunities and access to decent housing in a given area. Areas which are identified as most deprived in the City are often also those which could benefit most from the achievement of regeneration.

D.22 The delivery of residential, mixed use or employment development within an area within the 20% most deprived will therefore have a minor positive (+) effect. Sites outside of those areas will have a negligible (0) effect on this SA objective.

SA Objective 7: To provide good access to services, facilities and education

Residential and Mixed Use Site Options

D.23 The location of residential sites and mixed use sites incorporating residential development, could affect this objective by influencing people's ability to access existing services and facilities, although it is noted that larger scale development could potentially incorporate the provision of new services. The City centre is the main focus of services and facilities within Exeter although the District and Local Centres also provide services and facilities commensurate with their size. It is assumed that sites with a capacity of more than 1,000 homes will deliver their own local centre.

D.24 The effects of sites on the educational element of this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, and a general assumption has been made that individual sites of more than 1,000 dwellings capacity will deliver their own primary school.

Appendix D Site Assessment Criteria

- Sites that are within 720m of the City Centre or with a potential capacity of more than 1,000 homes will have a significant positive (++) effect.
- Sites with a capacity to deliver fewer than 1,000 homes and that are within 720m of a District Centre or Local Centre will have a minor positive (+) effect.
- Sites with a capacity to deliver fewer than 1,000 homes and that are not located within 720m of the City Centre or a District or Local Centre will have a minor negative (-) effect.

D.25 In addition, which could lead to mixed effects overall:

- Sites that are within 900m of a secondary school and within either 450m of a primary school or with a potential capacity of more than 1000 homes will have an uncertain significant positive (++?) effect.
- Sites with a capacity to deliver fewer than 1,000 homes and that are within 900m of a secondary school or within 450m of a primary school (but not both) will have an uncertain minor positive (+?) effect.
- Sites with a capacity to deliver fewer than 1,000 homes and that are more than 900m from a secondary school and more than 450m from a primary school will have an uncertain minor negative (-?) effect.

Employment Site Options

D.26 While employment sites are not expected to have a significant effect on this objective, where employment sites are within walking distance (720m) of the city, district or local centre, services and facilities will be more easily accessible to employees during breaks and before and after work.

- Sites that are within 720m of the City Centre or with a potential capacity of more than 1,000 homes will have a significant positive (++) effect.
- Sites with a capacity to deliver fewer than 1,000 homes and that are within 720m of a District Centre or Local Centre will have a minor positive (+) effect.

- Sites with a capacity to deliver fewer than 1,000 homes and that are not located within 720m of the City Centre or a District or Local Centre will have a minor negative (-) effect.

SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives

All Development Site Options

D.27 The proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of new developments, particularly at larger sites, but this cannot be assumed.

D.28 It is assumed that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on factors such as the availability of cycle storage facilities at their end destination, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site.

- Sites that are within 800m of a railway station and within 400m of a bus stop are likely to have a significant positive (++) effect.
- Sites that are within 800m of a railway station or within 400m of a bus stop are likely to have a minor positive (+) effect.

- Sites that are more than 800m from a railway station and more than 400m from a bus stop but which have a cycle path within 400m are likely to have a negligible (0) effect.
- Sites that are more than 800m from a railway station and more than 400m from a bus stop and cycle path could have a minor negative (-) effect.

SA Objective 9: To protect residential amenity by reducing air, noise and light pollution

All Development Site Options

D.29 Development sites that are within, or very close to, the Air Quality Management Area (AQMA) in the City, could increase levels of air pollution as a result of increased vehicle traffic in those areas. Therefore:

- Site options that are within 100m of the AQMA are likely to have a significant negative (--) effect.
- Site options that are not within 100m of the AQMA are likely to have a negligible (0) effect on air quality.

D.30 Development sites that are within the flightpath of Exeter Airport, or that are close to the M5, have the potential to impact on residential amenity through the exposure of residents to noise. Therefore:

- Site options that are within one of the recognised airport noise contours, where noise levels exceed 57db are likely to have a significant negative effect (--?). This can potentially be reduced through mitigation so the effect is uncertain.
- Site options that are adjacent to the M5 are likely to have a significant negative effect (--?). This can potentially be reduced through mitigation so the effect is uncertain.

D.31 All other site options are expected to have a negligible effect (0) in relation to noise.

SA Objective 10: To conserve and enhance biodiversity and geodiversity

All Development Site Options

D.32 Development sites that are within close proximity of an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

- Sites that contain a Local Wildlife Site or that are within 250m of an internationally or nationally designated biodiversity or geodiversity site may have a significant negative (--?) effect although this is uncertain.
- Sites that do not contain but are within 250m of a Local Wildlife Site or that are within 250m-1km of a nationally or internationally designated biodiversity or geodiversity site may have a minor negative (-?) effect although this would be uncertain.
- All other sites may have a negligible effect (0?) on this objective.

D.33 In addition, site options that contain an existing green infrastructure asset that could be lost as a result of new development may have a significant negative effect (--?), although this is currently uncertain as it may be possible to conserve or even enhance that asset through the design and layout of the new development.

SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape

All Development Site Options

D.34 All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. Exeter City Council has undertaken a landscape sensitivity study that has informed the site options appraisals. However, the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Therefore, all effects are recorded as uncertain.

- Sites that are located outside of the areas assessed in the Landscape Sensitivity Study as having medium or high landscape sensitivity could have a negligible (0?) effect.
- Sites that are located within an area designated in the Landscape Sensitivity Study as having medium landscape sensitivity could have a minor negative (-?) effect.
- Sites that are located within an area designated in the Landscape Sensitivity Study as having high, or medium-high, landscape sensitivity could have a significant negative (--?) effect.

SA Objective 12: To conserve and enhance the historic environment including the setting of heritage assets

All Development Site Options

D.35 Development sites that are within close proximity of a heritage asset have the potential to affect their setting and contribution to the local character and distinctiveness. Exeter City Council undertook a Heritage Impact Assessment to determine the impact of each site option against nearby heritage assets including the setting of the heritage asset. Each site option was given a RAG rating which has been translated into a SA score.

D.36 Therefore:

- If a site is identified in the Heritage Impact Assessment as red/amber then a significant negative effect is likely (--).
- If a site is identified in the Heritage Impact Assessment as yellow then a minor negative effect is likely (-).
- If a site is identified in the Heritage Impact Assessment as green then a negligible effect is likely (0).

SA Objective 13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources

Residential and Mixed Use Site Options

D.37 The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed based on the location of the sites. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. Therefore:

- Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding will have a significant negative (--) effect.
- Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding will have a minor negative (-) effect.
- Site options that are entirely or largely ($\geq 75\%$) within Flood Zone 1 will have a negligible (0) effect on the assumption that flood risk could be avoided.

D.38 Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site. However, the location of residential and employment development could affect water quality during construction depending on its proximity to watercourses and water bodies and Source Protection Zones. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design, therefore effects are uncertain at this stage. Therefore, which could result in mixed effects overall:

- Development on sites which contain a water body or water course or fall within or partially within a Source Protection Zone 1 could result in significant negative (--?) effects on water quality although this is uncertain at this stage of assessment.
- Development on sites which do not contain a water body or watercourse but fall within or partially within Source Protection Zones 2 and 3 could result in minor negative effects (-?) on water quality although this is uncertain at this stage of assessment.
- Development on sites which do not contain a water body or watercourse or fall within a Source Protection Zone would have a negligible (0) effect.

SA Objective 14: To support efficient use of resources, including land and minerals

All Development Site Options

D.39 Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites. Where development takes place on previously developed land, land of agricultural and mineral value is less likely to be lost and there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation.

- Mainly or entirely greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land will have a significant negative (--) effect.
- Mainly or entirely greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 3 agricultural land could have a significant negative (--?) effect. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality).
- Mainly or entirely greenfield sites that contain a less than significant proportion ($< 25\%$) of Grade 1, 2 or 3 agricultural land will have a minor negative (-) effect.

Appendix D Site Assessment Criteria

- Sites that are located mainly or entirely on brownfield land will have a significant positive (++) effect.

D.40 Furthermore, all new development will result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources. Therefore:

- Sites that fall within a Minerals Safeguarding Area could have a minor negative (-?) effect although this is uncertain.
- Sites that do not fall within a Minerals Safeguarding Area are expected to have a negligible (0) effect.

Appendix E

Council's Reasons for Selecting or Rejecting Site Options

Table E.1: Residential site options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
2	Land adjoining 6 Exe View Cottages	No	No	No	Site is unsuitable due to an unacceptable risk of flooding.
4	Land at Redhills, Exwick Lane	No	No	No	Site already has planning consent for residential development.
5	Land at Lugg's Farm, Redhills	No	No	No	Site is unsuitable due to unacceptable landscape impact and topography.
7	Merrivale Road	No	No	No	Availability of site not determined.
9	Flowerpot Lane Car Park, Flowerpot Lane	No	No	No	Suitability of site subject to further work to assess impacts of potential car park loss.
10	Okehampton Street Car Park, Okehampton Street	No	No	No	Suitability of site subject to further work to assess impacts of potential car park loss.
11	Land at Ide House	No	No	No	Site is unsuitable due to unacceptable landscape impact, unacceptable impact on a conservation area and topography.
13	Land at Taunton Close	No	No	Yes	Site is suitable, available and achievable.
17	Land west of Shillingford Road	No	No	No	Site is unsuitable due to conflict with the adopted South-West Exeter Development Brief SPD which identifies it as allotment space.
18	Land adjoining Silverlands, Chudleigh Road / Land west of Chudleigh Road	Yes	Yes	Yes	Site is part of the previous South-West Exeter allocation in the Core Strategy. It is suitable, available and achievable.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
21	Land between Lower Argyll Road and Belvedere Road	No	No	No	Site is unsuitable due to unacceptable landscape impact.
23	Land to the rear of 43 St David's Hill	No	No	No	Site is unsuitable and unachievable due to steep topography and highways access.
24	99 Howell Road	Yes	Yes	No	Site comprises a conversion that can come forward through a planning application rather than an allocation.
25	Bystock Terrace Car Park, Queens Terrace	No	No	No	Site is unsuitable due to unacceptable impact on a conservation area.
26	Land at Exeter Squash Club, Prince of Wales Road / Devon and Exeter Squash Club	Yes	Yes	Yes	Site is suitable, available and achievable.
27	Wynford Road	No	No	No	Availability of site not determined.
29	Land at Pendragon Road / Land off Pendragon Road	No	No	No	Site already has planning consent for residential development.
30	Rear of Beacon Lane shops	No	No	Yes	Site is suitable, available and achievable.
31	Lancelot Road	No	No	Yes	Site is suitable, available and achievable.
33	Land off Spruce Close	No	No	No	Site already has planning consent for residential development.
36	Woolsgrove, Church Hill	No	No	No	Site is unsuitable due to unacceptable landscape impact.
37	Land at Home Farm, Church Hill	No	No	No	Site is unsuitable due to unacceptable landscape impact.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
40	Exbridge House, 26 Commercial Rd	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land.
41	Land between St Anne's Well Brewery & Exeter College, Lower North Street	No	No	No	Due to constraints, the site could only be developed as a conversion. This can come forward through a planning application rather than an allocation.
43	Mary Arches Multi-Storey Car Park, Mary Arches Street	No	No	No	Site is included as part of the wider Mary Arches multi-storey and surface car park, Mary Arches Street allocation ref 163.
44	Mecca Bingo, 12 North Street	No	No	No	Site is unsuitable due to unacceptable impact on a listed building and its setting. Site is unachievable.
45	Smythen Street Car Park	No	No	No	Suitability of site subject to further work to assess impacts of potential car park loss.
47	Cathedral and Quay Car Park, Lower Coombe Street	No	No	No	Site is not available for development.
48	Magdalen Street Car Park	No	No	No	Site is included as part of the wider South Gate allocation ref 46.
50	Howell Road Car Park	No	No	No	Part of site is unsuitable due to underground utilities. Suitability of site also subject to further work to assess impacts of potential car park loss.
51	12-31 Sidwell Street / Land at Sidwell Street	Yes	Yes	Yes	Site is suitable, available and achievable.
53	City Point, Bampfylde Street	No	No	No	Site is part of the wider East Gate allocation ref 52.
54	Triangle Car Park, Russell Street	No	No	No	Site is unachievable.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
55	Pyramids Leisure Centre, Heavitree Road	No	No	No	Site is part of the wider East Gate allocation ref 52.
56	Parr Street Car Park, Parr Street	No	No	No	Suitability of site subject to further work to assess impacts of potential car park loss.
58	Fairbanks, 90 Polsloe Road	No	No	No	Part of site is unsuitable as it has recently been developed for housing. The remaining site is small and constrained by a large TPO tree, highways access and potential loss of a community facility.
60	Land at Hamlin Lane	Yes	Yes	Yes	Site is suitable, available and achievable.
63	Clifford Close	No	No	Yes	Site is suitable, available and achievable.
64	Whipton Community Hospital, Hospital Lane	No	No	Yes	Site is suitable, available and achievable.
66	Land at Cumberland Way	No	No	No	Site already has planning consent for residential development.
67	Grenadier Emperor, Grenadier Road	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land. Site is also unsuitable due to topography.
68	Grenadier Land 29, Grenadier Road	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land. Site is also unsuitable due to topography.
69	Magdalen Road Car Park	No	No	No	Part of site is unsuitable due to underground utilities. Suitability of site also subject to further work to assess impacts of potential car park loss.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
70	Mount Radford Lawn	No	No	No	Site is unsuitable due to unacceptable impact on the conservation area and unacceptable loss of a playing pitch.
72	Belle Isle Depot, Belle Isle Drive	Yes	Yes	Yes	Site is suitable, available and achievable.
73	91-97 Wonford Street	No	No	Yes	Site is suitable, available and achievable.
75	Chestnut Avenue	Yes	Yes	Yes	Site is suitable, available and achievable.
76	Bishop Westall Road	No	No	No	Availability of site not determined.
79	Park and Ride Site, Digby Drive / Car park north of Digby Drive	No	No	No	Development could result in the loss of a key park and ride facility. Site is also unsuitable due to TPO trees.
80	Former overflow car park, Tesco, Russell Way	Yes	Yes	No	Site has planning consent for a drive-through.
81	Land adjacent Tesco Store, Russell Way	No	No	No	Site is unsuitable due to TPO trees and topography.
82	Land south of Russell Way	No	No	No	Site is unsuitable due to TPO trees. Site is unachievable due to highways access, topography and TPO trees.
84	Garages at Lower Wear Road	Yes	Yes	Yes	Site is suitable, available and achievable.
85	Land at Glasshouse Lane	No	No	No	Development would result in the loss of public open space and could unacceptable impact on significant trees.
86	Wear Barton Playing Fields, Wear Barton Road	No	No	No	Site is unsuitable due to the loss of a playing pitch.
91	Land at Newcourt Road, Topsham	Yes	Yes	Yes	Site is suitable, available and achievable.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
92	Land to the east of Newcourt Road	Yes	No	No	Northern part of the site already has planning consent for residential development. Southern part of the site is suitable, available and achievable and is assessed as allocation ref 153.
94	Land west of Newcourt Road	Yes	Yes	Yes	Site is suitable, available and achievable.
95	Land at Topsham Golf Academy	No	No	Yes	Site is suitable, available and achievable.
96	Land at Clyst Road, Topsham	No	No	No	Site already has planning consent for residential development.
98	Mays Field, Topsham	No	No	No	Site is unsuitable due to unacceptable landscape impact and TPO trees. Site is unachievable due to highways access.
99	Mount Howe Field, Topsham	No	No	No	Site is unsuitable due to unacceptable landscape impact and unacceptable flood risk. Site is unachievable due to highways access and flood risk.
100	Fever & Boutique, 12 Mary Arches Street, Exeter	Yes	Yes	Yes	Site is suitable, available and achievable.
102	Civic Centre, Paris Street	No	No	No	Site is part of the wider East Gate allocation ref 52.
103	Clarendon House, Western Way	No	No	No	Site is part of the wider East Gate allocation ref 52.
104	Former police station and Devon magistrates court, Heavitree Road	No	No	Yes	Site is suitable, available and achievable.
105	Honeylands, Pinhoe Road	No	No	No	Site already has planning consent for an older persons care home.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
106	Land lying east of Pinn Lane	Yes	Yes	Yes	Site is part of the previous Monkerton Hill Barton allocation in the Core Strategy. Site is suitable, available and achievable.
107	Land south of Gypsy Hill Lane	No	No	Yes	Site is part of the previous Monkerton Hill Barton allocation in the Core Strategy. Site is suitable, available and achievable.
108	Hessary, Hollow Lane	No	No	Yes	Site is part of the previous Monkerton Hill Barton allocation in the Core Strategy. Site is suitable, available and achievable.
109	Land to the north, south and west of the Met Office, Hill Barton	Yes	No	No	Site already has planning consent for residential development and is within the previous Monkerton Hill Barton strategic allocation in the Core Strategy.
110	88 Honiton Road	Yes	Yes	Yes	Site is suitable, available and achievable.
111	Sowton Park and Ride, Sidmouth Road	No	No	No	Development could result in the loss of a key park and ride facility.
112	DOA & Exeter Mobility Centre, Wonford Road	No	No	No	Site is not available for development.
114	Corner of Retreat Drive and Exeter Road, Topsham	No	No	No	Site already has planning consent for residential development.
115	Land at Retreat Drive, Topsham	No	No	No	Site already has planning consent for residential development.
116	Land at Water Lane	No	No	No	Site is part of the wider Water Lane allocation ref 15.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
117	Isca House, Haven Road	No	No	No	Site is part of the wider Water Lane allocation ref 15.
119	Falcon House, Falcon Road	No	No	No	Site is within an area of high quality employment use and development could result in the loss of a community facility.
120	22 Marsh Green Road	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land.
121	RGB Exeter, Alphinbrook Road, Marsh Barton	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land.
122	1-9 Alpin Brook Road	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land.
123	CP Arts, Alphin Brook Road, Exeter	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land. Site is also unsuitable due to location in a waste consultation zone.
124	1-5 Elm Units, Grace Road South	No	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land. Site is also unsuitable due to location within a waste consultation zone.
125	Land behind 66 Chudleigh Road	Yes	Yes	Yes	Southern part of the site within the previous South-West Exeter allocation in the Core Strategy. Site is suitable, available and achievable.
127	Knowle Hill, Dawlish Road	N/A	No	No	Site is unsuitable due to unacceptable landscape impact.

Appendix E Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
129	Newbery Car Breakers, Redhills	N/A	No	Yes	Site is suitable, available and achievable.
130	Vulcan Works, Water Lane, Exeter	N/A	No	No	Site is part of the wider Water Lane allocation ref 15.
131	Exbridge House, 26 Commercial Road (2)	N/A	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land.
132	Larkbeare House	N/A	No	No	Due to constraints, the site could only be developed as a conversion or within the existing building footprint. This can come forward through a planning application rather than an allocation.
133	Land at Matford Lane	N/A	No	No	Part of the site is unsuitable due to TPO trees. The northern part of the site is not available. The suitable southern part of the site is allocated under ref 158.
136	Land adjacent Ikea, Newcourt Way	N/A	Yes	Yes	Site comprises a previous allocation in the Core Strategy. It is suitable, available and achievable.
143	Land at Cowley Bridge Road	N/A	Yes	No	Site already has planning consent for residential development.
148	Land opposite 51 Homefield Road	N/A	N/A	No	Site is unsuitable due to unacceptable impact on a conservation area and unacceptable loss of a playing pitch. Site is unachievable due to unacceptable impact on a conservation area.
150	Land and Buildings at Victoria Street	N/A	N/A	Yes	Site is suitable, available and achievable.
151	Rougemont Switching Centre, Queens Road	N/A	N/A	Yes	Site is suitable, available and achievable.

Appendix E Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
152	Barton Place, 4 Wrefords Link	N/A	N/A	No	Part of site is unsuitable due to unacceptable landscape impact. Due to constraints, the rest of site could only be developed as a conversion. This can come forward through a planning application rather than an allocation.
153	Land to the east of Newcourt Road 2, Topsham	N/A	N/A	Yes	Site is suitable, available and achievable.
154	Land adjoining 1 and 2 Lower Shapter Street, Topsham	N/A	N/A	No	Site is unsuitable due to unacceptable landscape impact. Site is unachievable due to lack of highways access.
156	The Pyramids, John Hannam House and Eaton House/Eaton Drive	N/A	N/A	No	Site is part of the wider East Gate allocation ref 52.
157	62 and 64 Alphington Road	N/A	N/A	No	Part of site is unsuitable due to unacceptable heritage impact. Residential redevelopment of the rest of the site would result in the loss of employment land.
158	Land at Matford Lane (2)	N/A	N/A	Yes	Site is suitable, available and achievable.
159	Church Lawn, Church Hill	N/A	N/A	No	Site is unsuitable due to unacceptable landscape impact.
160	Unit 1, Summerland Street	N/A	N/A	Yes	Site is suitable, available and achievable.
163	Mary Arches multi-storey and surface car park, Mary Arches Street	N/A	N/A	Yes	Site is suitable, available and achievable.
164	Land north of Tithebarn Way	N/A	N/A	No	Site is unsuitable due to unacceptable flood risk. Site is not achievable due to lack of appropriate highways access.
165	Gypsy Hill Hotel, Gypsy Hill Lane	N/A	N/A	Yes	Site is suitable, available and achievable.

Table E.2: Mixed use site options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
1	Hamlyns Farmhouse & Hamlyns Farm, St Andrews Road	No	No	No	Site is unsuitable due to unacceptable landscape impact, a and topography and unsuitable and unachievable due to lack of highways access..
6	Land on the west side of Barley Lane	No	No	No	Site is unsuitable due to unacceptable landscape impact and topography. Part of the site is unachievable.
12	Oaklands Riding School & The Rosary, Balls Farm Road	No	No	No	Site is unsuitable due to unacceptable landscape impact, unacceptable impact on a conservation area and unacceptable risk of flooding.
14	Marsh Barton	Yes	Yes	No	Parts of site are unsuitable due to an unacceptable risk of flooding, location in a minerals safeguarding area, location in a waste consultation zone and topography. Also, availability of parts of the site not determined. However, parts of the site are suitable and may be available during Plan period.
15	Water Lane	Yes	Yes	Yes	Site is suitable, available and achievable. Part of site is within the previous Water Lane allocation in the Exeter Local Plan First Review.
16	Haven Banks Retail Park, Water Lane	No	No	No	Site is allocated as part of the wider Water Lane allocation ref 15.
20	Land at Bellenden, Wrefords Lane	No	No	No	Site is unsuitable due to unacceptable landscape impact, topography and TPO trees.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
22	Red Cow/St David's	Yes	Yes	No	Site is allocated as part of wider Red Cow allocation ref 145. Site is within the previous St Davids allocation in the Exeter Local Plan First Review.
28	Land at Stoke Hill	No	No	No	Site is unsuitable due to unacceptable landscape impact and unachievable due to highways access.
34	Gray's Barn, Church Hill	No	No	No	Site is unsuitable due to unacceptable landscape impact, unacceptable flood risk and topography. Site is unachievable due to highways access, topography and poor accessibility to services and facilities.
39	West Gate	Yes	No	No	Parts of site are unsuitable due to landscape impact, unacceptable flood risk, unacceptable impact on a conservation area, topography and because it contains infrastructure that is to remain in situ. However, area around Exe Bridges Retail Park is suitable..
42	North Gate	Yes	Yes	No	Parts of the site are unsuitable due to unacceptable impact on listed buildings and their setting and topography. Availability of parts of the site not determined.
46	South Gate	Yes	Yes	Yes (part)	Part of site is suitable, available and achievable. Only that part which is suitable, available and achievable is proposed for allocation.
52	East Gate	Yes	Yes	Yes (part)	Part of site is suitable, available and achievable. Only that part which is suitable, available and achievable is proposed for allocation.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council's Reasons for Decision-Making
83	St Bridget Nurseries, Old Rydon Lane / St Bridget Nurseries, Old Rydon Lane	Yes	No	Yes	Site is part of the previous Newcourt allocation in the Core Strategy. Site is suitable, available and achievable.
88	Land at Seabrook Farm, Topsham	No	No	No	Site already has planning consent for residential development and is within the previous Newcourt strategic allocation in the Core Strategy.
89	Sandy Gate	Yes	No	Yes	Redevelopment of the site for residential use would result in a loss of high quality employment land. Development could also result in the loss of a key park and ride facility and motorway service station. Site is also unsuitable due to TPO trees and topography.
90	Land at Old Rydon Lane	No	Yes	Yes (part)	Development of the northern part of the site for residential use would result in a loss of high quality employment land. The southern part of the site is within the previous Newcourt strategic allocation in the Core Strategy and is suitable, available and achievable.
97	Land to the east of Clyst Road	No	No	No	Site is unsuitable due to unacceptable landscape impact and unacceptable flood risk. Site is unachievable.
128	Land on the west side of Barley Lane (2)	N/A	No	No	Site is unsuitable due to unacceptable landscape impact. Part of the site is unachievable.
134	Land at Stoke Hill (2)	N/A	No	No	Site is unsuitable due to unacceptable landscape impact and unachievable due to highways access and accessibility.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
138	Land east of Clyst Road, Topsham (2)	N/A	No	No	Site is unsuitable due to unacceptable landscape impact. Site is unachievable.
139	Residual Land at Newcourt	N/A	No	No	Site is part of the wider Land at Old Rydon Lane allocation ref 90.
142	Exe Bridges Retail Park	N/A	Yes	Yes	Site is suitable and in accordance with the development strategy.
145	East Gate (2)	N/A	N/A	Yes (part)	Part of site is suitable, available and achievable. Only that part which is suitable, available and achievable is proposed for allocation.
146	Red Cow/St Davids (2)	N/A	N/A	Yes	Site is suitable, available and achievable. Site is within the previous St Davids allocation in the Exeter Local Plan First Review.
170	Marsh Barton	Yes	Yes	No	Parts of site are unsuitable due to an unacceptable risk of flooding, location in a minerals safeguarding area, location in a waste consultation zone and topography. Also, availability of parts of the site not determined. However, parts of the site are suitable and may be available during Plan period.

Table E.3: Employment site options

Site Option	Site Name	Proposed as an Allocation in the Outline Draft Plan (September 2022)?	Proposed as an Allocation in the Full Draft Plan (October 2023)?	Proposed as an Allocation in the Publication Plan (October 2024)	Exeter City Council’s Reasons for Decision-Making
136	Land adjacent Ikea, Newcourt Way	N/A	Yes	Yes	Site comprises a previous allocation in the Core Strategy. It is suitable, available and achievable.
140	Land adjacent to Sandy Park	N/A	Yes	Yes	Site comprises a previous allocation in the Core Strategy. It is suitable, available and achievable.
141	St Luke’s Campus, Heavitree Road	N/A	Yes	Yes	Site is suitable, available and achievable.

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- 13 The updated PPG clarifies that this requirement of the NPPF is to be applied “where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period”. Furthermore, where this requirement applies “the authority will need to ensure that their vision reflects the long-term nature of their strategy for the plan or those larger scale developments. It is not anticipated that such visions would require evidence in addition to that already produced to support the plan”.
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- 27 Exeter City Council (2022) 2022 Review of Houses in Multiple Occupation: Data Update and Options Report [online] -

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