

Exeter City Council

Exeter Plan **Sustainability Appraisal** **Statement**

Prepared by LUC
May 2025



How environmental and sustainability considerations have been integrated into the Exeter Plan

The Sustainability Appraisal has been conducted in such a way that it meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on the preparation of Sustainability Appraisals. As required by the regulations, the Sustainability Appraisal has been developed through an iterative process and has informed decision making at every stage of developing the Exeter Plan.

The initial informative stage of the Sustainability Appraisal was the Scoping process. This included a review of other relevant plans, programmes and strategies that have an influence on sustainability and provide the policy context for the Exeter Plan. The social, environmental and economic baselines were established which identified the key sustainability issues to be addressed and provided the basis from which the potential effects of the Exeter Plan could be assessed. The Scoping process has been updated as the plan has developed over time. The original Scoping consultation took place from April 2022 and the key elements of the Scoping Report (i.e. the baseline information, review of plans, policies and programmes and key sustainability issues) have been reviewed and updated as appropriate in the Sustainability Appraisal Reports prepared at each stage of plan preparation since then.

How the Sustainability Appraisal has been taken into account

The policies and sites within the Exeter Plan, as well as the reasonable alternative options, have been subject to Sustainability Appraisal throughout the development of the Plan. Each option and policy has been assessed against the social, environmental and economic objectives in the Sustainability Appraisal framework in order to establish the likely positive and negative effects. Where significant negative effects were found, potential mitigation measures were identified wherever possible. The results of the appraisals were used to inform the decision-making process and establish appropriate options to take forward into the Exeter Plan. Each stage of developing the Plan has included undertaking Sustainability Appraisal to take account of new evidence and new policy options. These updates helped further refine the options to include in the Plan.

The Sustainability Appraisal Report includes the individual appraisals for each policy option taken forward into the Exeter Plan as well as the reasonable alternative options considered. The Sustainability Appraisal Report also includes an overview of all of the policies included in the Publication Plan to show the cumulative impact of the policies (see Chapter 6).

Where appropriate, recommendations have been made in the Sustainability Appraisal regarding specific amendments that could be made to policies to minimise the potential negative effects identified or provide more robust mitigation for the effects of other Exeter Plan policies. At each stage of plan-making, the Sustainability Appraisal was initially undertaken on the basis of a draft version of the consultation document so that there was an opportunity to feed any such recommendations back to the Council before the current iteration of the Plan was finalised. The Sustainability Appraisal has then been updated to reflect the final consultation document, and to explain how recommendations made previously have been addressed. For the current stage of plan-making, this information is provided in Chapter 6 of the Sustainability Appraisal report.

How the results of consultation have been taken into account

The SEA Regulations require that opinions expressed by consultees be taken into account during the development of a plan before the plan is adopted. The Sustainability Appraisal was consulted on alongside consultation on the draft Plan at each stage. All comments and representations were taken into account and used to further refine the Sustainability Appraisal, as detailed in Appendix A of the Sustainability Appraisal report.

The reasons for choosing the Publication (Regulation 19) Exeter Plan, in light of reasonable alternatives considered

The Exeter Plan sets the spatial vision of the place that Exeter will become by 2041, based on the Exeter Vision 2040 that was developed in 2019 by the City Council. The vision is supported by 11 overarching objectives and together the vision and objectives are considered to provide a robust framework for the preparation of the Publication Plan.

The approach within the Exeter Plan has been developed with the aim of delivering the spatial vision, informed by a range of evidence-base studies and the Sustainability Appraisal.

Level of growth

The Exeter Plan sets out to meet Exeter's evidence-based needs. The objectively assessed housing need (OAN) for Exeter, using the Government's standard method (in the 2023 NPPF), is 642 dwellings per annum and this is the figure taken forward in

the Plan (policy H1). The total figure over the Plan period (13,975) allows for some headroom to ensure delivery of at least the required figure. No reasonable alternative options for the amount of development have been considered in the Sustainability Appraisal 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 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 Sustainability Appraisal 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.

In terms of employment land, the approach taken forward in the Exeter Plan is also based on the evidence. The Economic Development Needs Assessment (EDNA) found that there is a need for up to 284ha of employment land across the Functional Economic Market Area (FEMA) over the Plan period. At the time when the EDNA was published there was up to 229ha of land available across the FEMA and therefore a shortfall was identified. However, since the EDNA was published, additional employment allocations have been made within the emerging Local Plans across the FEMA (including allocation of approximately 15ha across three sites in policy EJ6 of the Exeter Plan) and the total supply is now approximately 352 hectares. The significant over-provision of employment space across the four local authority areas of East Devon, Exeter, Mid Devon and Teignbridge demonstrates that the employment needs of the FEMA are being met. There are no alternative options for the quantum of employment development which required consideration through the Sustainability Appraisal.

Distribution

In terms of the location of new development, 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.

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 later formed the basis for Chapter 4 of the Sustainability Appraisal Report for the Outline Draft Plan. That appraisal work was repeated in the Sustainability Appraisal Report for the Full Draft Plan (October 2023) and was again presented in Chapter 4 of the Sustainability Appraisal report for the Publication Plan (December 2024). Providing the Sustainability Appraisal findings to the Council internally, before they were later published as part of the Sustainability Appraisal Report for the Outline Draft Plan, gave the Council the opportunity to take into account the Sustainability Appraisal findings, along with other relevant factors, when considering which option(s) to take forward.

As described in Chapter 4 of the Sustainability Appraisal report, Option A has been taken forward and forms the basis for the strategy detailed in policy S1. 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 Sustainability Appraisal by the fact that it performed the best of the four options considered.

Site options

At each stage of the Sustainability Appraisal, reasonable alternative options for specific development site allocations have been considered using a consistent approach which is proportionate to the scope of the Sustainability Appraisal process. The Sustainability Appraisal findings for the individual site options have been considered by the Council alongside its own site assessment work to inform decision making. A site-by-site list of the options considered and the Council's reasons for selecting or rejecting each option can be found in Appendix E of the Sustainability Appraisal report.

Other key policy objectives and issues

The various stages of developing the Sustainability Appraisal have provided an iterative and rational method for refining the options considered throughout the Plan-making process. Based on the overarching objectives of the Exeter Plan and informed through the supporting evidence and the Sustainability Appraisal, the policies framework seeks to ensure the delivery of appropriate housing, enabling sustainable economic growth, enhancing and protecting the environment, supporting strong and healthy communities and delivering infrastructure. The various Sustainability Appraisal reports published during the preparation of the plan have shown that reasonable and alternative options have been considered and evaluated.

Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

A monitoring framework is included in Chapter 7 of the Sustainability Appraisal Report. This enables the significant effects of implementing the Exeter Plan sites and policies to be assessed and compared to those predicted in the Sustainability Appraisal Report. It helps to ensure that any unforeseen adverse effects can be identified, and remedial action taken if required.