

Exeter Plan: Draft Plan Consultation

Sustainability Appraisal Report

Exeter City Council

Final report

Prepared by LUC

October 2023

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Exeter Plan: Draft Plan Consultation

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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 2020 and 2040 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 Full Draft Plan (October 2023) 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 130,800 [\[See reference 1\]](#) 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 1,364,000 people per month (pre-Covid) [\[See reference 3\]](#). 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.



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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 2020 and 2040, 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 [\[See reference 4\]](#) 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 have in turn fed into the preparation of the current Full Draft Plan, which this SA report relates to.

Structure of the Full Draft Exeter Plan

1.6 The Full Draft 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 63 policies within the Full Draft Plan, which is structured as follows:

- Objectives
- Strategy
 - Policy S1: Spatial Strategy
 - Policy S2: Liveable Exeter Principles
- Climate Change
 - Policy CC1: Net zero Exeter
 - Policy CC2: Renewable and low carbon energy

- Policy CC3: Local energy networks
- Policy CC4: Ground-mounted photovoltaic arrays
- Policy CC5: Future development standards
- Policy CC6: Embodied carbon
- Policy CC7: Solar-ready development
- Policy CC8: Flood risk
- Policy CC9: Water quantity and quality
- Homes
 - Policy H1: Housing requirement
 - Policy H2: Housing allocations and windfalls
 - Policy H3: Affordable housing
 - Policy H4: Build to rent
 - Policy H5: Co-living housing
 - Policy H6: Custom and self-build housing
 - Policy H7: Specialist accommodation
 - Policy H8: Purpose built student accommodation
 - Policy H9: Gypsy and traveller accommodation
 - Policy H10: Residential conversions and houses in multiple occupation
 - Policy H11: Loss of residential accommodation
 - Policy H12: Accessible homes
 - Policy H13: Housing density and size mix
 - Policy H14: Residential amenity and healthy homes
- Economy and Jobs
 - Policy EJ1: Economic growth in the transformational sectors
 - Policy EJ2: Retention of employment land

- Policy EJ3: New forms of employment provision
- Policy EJ4: Access to jobs and skills
- Policy EJ5: Provision of local services in employment areas
- Policy EJ6: New transformational employment allocations
- The Future of our High Streets
 - Policy HS1: The Vitality of our high streets and centres
- Sustainable Transport and Communication
 - Policy STC1: Sustainable movement
 - Policy STC2: Active and sustainable travel in new developments
 - Policy STC3: Supporting active travel
 - Policy STC4: Supporting public transport
 - Policy STC5: Supporting new forms of car use
 - Policy STC6: Travel plans
 - Policy STC7: Safeguarding transport infrastructure
 - Policy STC8: Motorway service area
 - Policy STC9: Digital communications
- Natural Environment
 - Policy NE1: Landscape setting areas
 - Policy NE2: Valley Parks
 - Policy NE3: Biodiversity
 - Policy NE4: Green infrastructure
 - Policy NE5: The Green Circle
 - Policy NE6: Urban greening factor
 - Policy NE7: Urban tree canopy cover
- History and Heritage

- Policy HH1: Conserving and enhancing Exeter's historic environment
- Policy HH2: Heritage assets and climate change
- Policy HH3: Conserving and enhancing Exeter City Walls
- Culture and tourism
 - Policy C1: Protecting and enhancing cultural and tourism facilities
 - Policy C2: Development and cultural provision
- High Quality Places and Design
 - Policy D1: Design principles
 - Policy D2: Advertisements
- Health and Wellbeing
 - Policy HW1: Health and wellbeing
 - Policy HW2: Pollution and contaminated land
- Infrastructure and Community Facilities
 - Policy IC1: Delivery of infrastructure
 - Policy IC2: Viability
 - Policy IC3: Community facilities
 - Policy IC4: Sport, recreation and allotment space in new development
 - Policy IC5: Play areas in new development
 - Policy IC6: New cemetery provision

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 5]. 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. 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 6]. 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'.

1.8 In May 2022 the Government published the Levelling up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report (EOR). Consultation on the proposals for EORs took place between March and June 2023. The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Exeter Plan is prepared.

1.9 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

1.10 The section below signposts the relevant sections of this SA Report that are considered to meet the SEA Regulations requirements. This will be included in the SA Report at each stage of plan preparation to show how the requirements of the SEA Regulations have been met through the SA process.

Environmental Report

1.11 This SA Report, which has been produced to accompany consultation on the Full Draft Plan, constitutes the ‘environmental report’ and covers the following SEA Regulations requirement:

- Regulation 12(1) and (2) and Schedule 2: 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.

1.12 Chapter 1, Chapter 3, Appendix B and Appendix C cover the following SEA Regulations requirements:

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

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.
- 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.
- 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.

1.13 Chapter 4, Chapter 5 and Chapter 6 covers the following SEA Regulations requirements:

- 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).
- 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.

1.14 Chapter 2 covers the following SEA Regulation requirement:

- 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.

1.15 Chapter 7 covers the following SEA Regulations requirement:

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

1.16 A separate non-technical summary document has been prepared to accompany this report and covers the following SEA Regulation requirement:

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

1.17 The Environmental Report at each stage of the SA will adhere to the following SEA Regulation requirement:

- Regulation 12(3): 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.

Consultation

1.18 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. This covers the following SEA Regulations requirement:

- Regulation 12(5): 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.

1.19 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 is taking place between October 2023 and January 2024. The consultation document is accompanied by this SA Report. This covers the following SEA Regulations requirement:

- Regulation 13: 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.

1.20 The Exeter Plan is not expected to have significant effects on other EU Member States. This covers the following SEA Regulations requirement:

- Regulation 14: Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.

Taking the Environmental Report and the Results of the Consultations into Account in Decision-making (relevant extracts of Regulation 16)

1.21 The following SEA Regulations requirement is to be addressed after the Exeter Plan is adopted:

- 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.

Monitoring

1.22 Chapter 7 proposes indicators for monitoring the likely significant effects of the Exeter Plan and this covers the following SEA Regulations requirement:

- Regulation 17(1): 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.

Structure of the SA Report

1.23 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 to date.
- 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 to date.
- Chapter 6: Sustainability Appraisal Findings for the Full Draft Plan presents the SA findings for the policies in the Full Draft Plan (October 2023) and describes the likely cumulative effects of the emerging plan.
- Chapter 7: Monitoring describes suggested indicators for monitoring the potential sustainability effects of the Exeter Plan.
- Chapter 8: Conclusions presents the conclusions of the SA of the Full Draft Plan and describes the next steps to be undertaken.
- Appendix A: Consultation Comments Received in Relation to the SA Scoping Report (March 2022) and the SA Report for the Outline Draft Plan (August 2022) presents a record of the consultation comments received in relation to the SA Scoping Report in March 2022 and the SA Report for the

Outline Draft Plan in August 2022 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 propose as allocations in the Exeter Plan.

1.24 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. The following section sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Corresponding Stages in Plan-making and SA

Local Plan Step 1: Evidence Gathering and Engagement

2.2 This Local Plan step relates to the following stages in SA:

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

- 1. Reviewing the other relevant policies, plans and programmes.
- 2. Collecting baseline information.
- 3. Identifying sustainability issues.
- 4. Developing the SA Framework.

- 5. Consulting on the scope and level of detail of the SA.

Local Plan Step 2: Production

2.3 This Local Plan step relates to the following stages in SA:

SA Stage B: Developing and refining options and assessing effects

- 1. Testing the Plan objectives against the SA Framework.
- 2. Developing the Plan objectives.
- 3. Evaluating the effects of the Plan.
- 4. Considering ways of mitigating adverse effects and maximising beneficial effects.
- 5. Proposing measures to monitor the significant effects of implementing the Plans.

SA Stage C: Preparing the Sustainability Appraisal Report

- 1. Preparing the SA Report.

SA Stage D: Seek representation on the Plan and the Sustainability Appraisal Report

- 1. Public participation on Plan and the SA Report.
- 2(i). Appraising significant changes.

Local Plan Step 3: Examination

2.4 This Local Plan step relates to the following stages in SA:

SA Stage D: Seek representations on the Plan and the Sustainability Appraisal Report

- 2(ii). Appraising significant changes resulting from representations.

Local Plan Steps 4 and 5: Adoption and Monitoring

2.5 This Local Plan step relates to the following stages in SA:

SA Stage D: Seek representations on the Plan and the Sustainability Appraisal Report

- 3. Making decisions and providing information.

SA Stage E: Monitoring the significant effects of implementing the Plan

- 1. Finalising aims and methods for monitoring.
- 2. Responding to adverse effects.

2.6 The sections below describe the approach that has been taken to the SA of the Exeter Plan to date and provide information on the subsequent stages of the process.

SA Stage A: Scoping

2.7 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

2.8 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.

2.9 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 [\[See reference 7\]](#) and was updated as part of the preparation of the SA Report for the Outline Draft Plan (August 2022). It has again been reviewed and updated during the preparation of this current 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

2.10 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.

2.11 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.

2.12 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.

2.13 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 Report for the Outline Draft Plan (August 2022) the baseline information for Exeter City which was originally presented in the SA Scoping Report was reviewed and updated where possible (for example, some initial 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

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

2.15 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 (March 2022) and a small number of amendments have since been made to these in response to consultation comments received.

Develop the SA Framework

2.16 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.

2.17 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.

2.18 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

2.19 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.

2.20 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.

2.21 Appendix A lists the comments that were received on the scope of the SA during this period of consultation and describes how each one has been addressed in the preparation of this SA report. In light of the comments received, amendments were made to the monitoring framework specifically SA Objective 12; SA Framework specifically SA Objective 10. These are reflected in this current SA report.

SA Stage B: Developing and Refining Options and Assessing Effects

2.22 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.

2.23 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.”

2.24 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.”

2.25 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).

2.26 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, which are appraised in this report, have been identified.

Strategic Options

2.27 Exeter City Council has 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.

2.28 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 and is repeated in Chapter 4 of this current SA report. This provided the Council with 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 document.

2.29 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

2.30 A series of site options were 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 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.

2.31 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.

2.32 Since consultation took place on the Outline Draft Plan, a further 17 reasonable alternative site options have been identified by the Council. These were identified as a result of further site submissions submitted during the consultation and by additional work undertaken by Officers. These 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 Draft Plan. The updated site appraisal work is now presented in Chapter 5 of this report.

SA Stage C: Preparing the Sustainability Appraisal Report

2.33 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 Draft Plan consultation document, 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.

2.34 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

2.35 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 Full Draft Plan. This SA Report is being published on the Council's website at the same time as the consultation on the Full Draft Plan, so that the two documents can be read in parallel. Consultation comments received on this SA Report will be taken into account at the next stage of the SA.

SA Stage E: Monitoring Implementation of the Local Plan

2.36 Draft 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 and these will be updated as appropriate during later stages of the SA.

Appraisal Methodology

2.37 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 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.).

2.38 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

2.39 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 and mixed-use 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

2.40 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.”

2.41 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).
- Some of the data available at the national and district levels are based on the reporting of the 2011 Census. This data allows for comparisons to be made between the City and national performance in relation to number of indicators; however it recognised that data is now relatively old considering the timings of the national census. Some initial 2021 Census data has been released recently and reflected in this report, and if more becomes available later in the SA process it will be used to inform the SA as appropriate.
- There is limited information on up to date business stock levels, and retail occupancy and vacancy rates.
- There is limited up to date biodiversity information locally, as the most recent Biodiversity Action Plan was completed in 2005.
- Apart from sampling point data [\[See reference 8\]](#); 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 the M5. 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 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.
- Where site options are close to the 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.
- A distance based approach has been used for appraising site options under SA Objective 12: To conserve and enhance the historic environment

including the setting of heritage assets due to the lack of heritage assessment available.

- 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 scores, as set out in the assumptions (see Appendix D).
- It became apparent during the site appraisal 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 previous 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.

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):

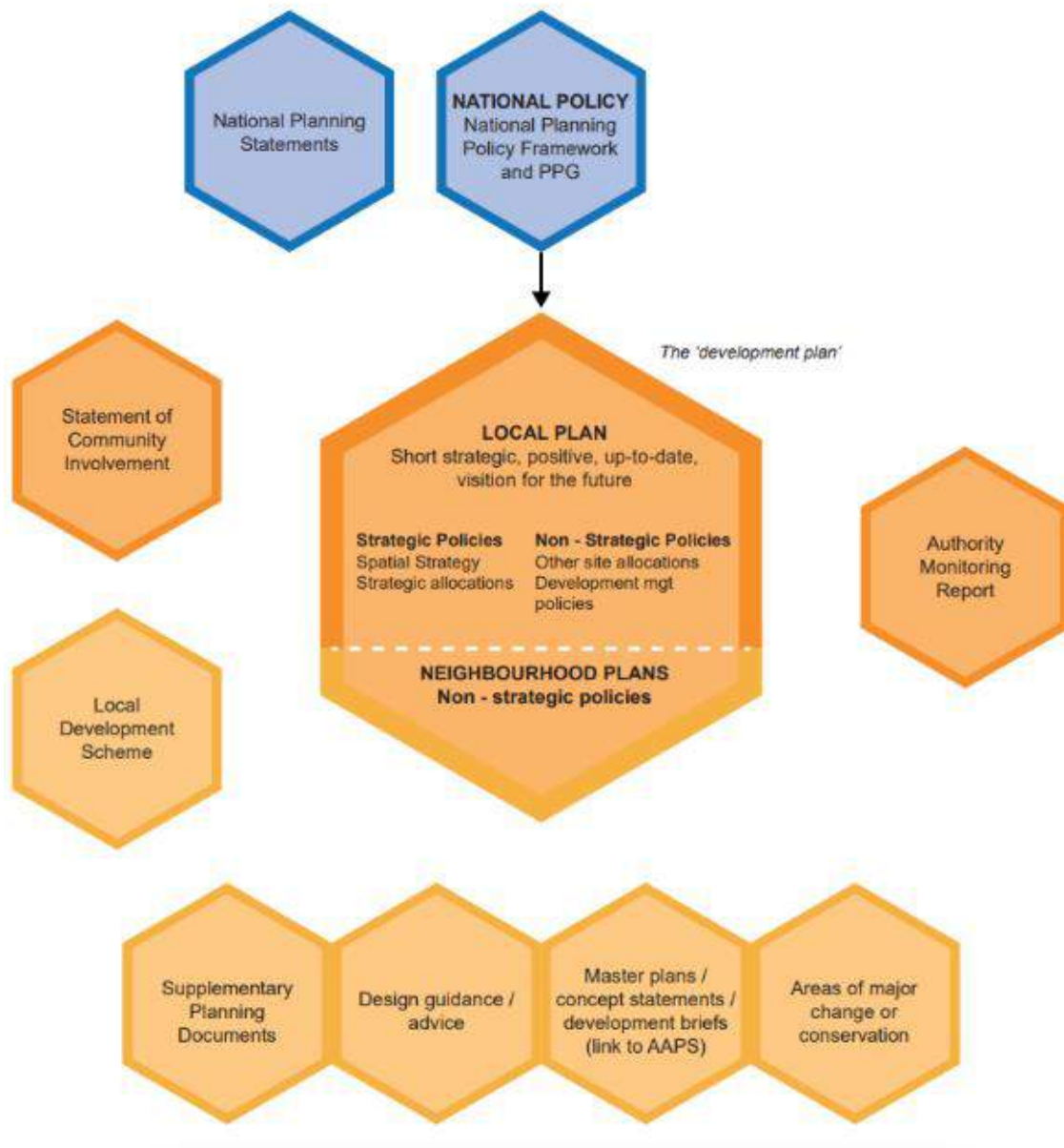
- 1. “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes”; and
- 5. “the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives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

3.2 A description of the Draft 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 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 with other relevant plans and programmes



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:

- COVID-19 – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.
- Global Insecurity – The invasion of Ukraine by Russia has generated wide-ranging consequences. Apart from the direct impacts that the conflict has had on affected communities, the war has also led to large shifts in population and generated significant uncertainty across a range of economic markets, including energy.
- Brexit – As of the end of January 2020 the UK has left the EU. Principally, the UK's environmental law is derived from EU law or was directly effective EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converts existing EU law which applied directly in the UK's legal system (such as EU Regulations and EU Decisions) into UK law and preserves laws made in the UK to implement EU obligations (e.g. the laws which implement EU Directive). This body of law is known as retained EU law and could be subject to future, post-Brexit amendments. As set out in the Explanatory Memorandum accompanying the Brexit amendments, the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are made by this instrument to the way the SEA regime operates. Relevant international plans and policy (including those at the EU level) are transposed into national plans, policy and legislation.
- The Levelling Up and Regeneration Bill [\[See reference 9\]](#) – The Levelling Up White Paper recognises that opportunities across the UK are unevenly

distributed. Accordingly, the paper presents levelling up as strategy for allowing everyone to flourish, live longer, and follow more fulfilling lives. In order to encourage a sustained rise in living standards and well-being, a series of policies and measures are identified. Collectively the programme seeks to boost productivity, pay, employment and living standards by growing the private sector. It also seeks to improve public services and restore a sense of community, local pride and belonging. The Levelling-up and Regeneration Bill was presented to parliament in May 2022. Key proposals for planning include measures to increase the speed of plan making, to introduce a suite of national development management policies, and a new levy charge on development that will be non-negotiable. It also proposes a more judgement-based system for assessing the level of collaboration between authorities in their plan-making activities and identifies the potential for introducing a streamlined ‘environmental outcomes report’. Such a report could potentially replace existing processes surrounding Strategic Environmental Assessments (SEA), Habitats Regulations Assessments (HRA), and Environmental Impact Assessments (EIA).

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 [\[See reference 10\]](#) and Habitats Regulations [\[See reference 11\]](#). 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 [\[See reference 12\]](#) 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 September 2023. Recent updates to 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.

3.10 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.”

3.11 The PPG [\[See reference 13\]](#) 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.

3.12 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.

3.13 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.

3.14 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.

3.15 The SA can consider the contribution the alternatives make in terms of contribution to climate change mitigation as well as climate change adaptation.

3.16 In relation to health and wellbeing, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework.

3.17 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 14]. The need for policies to be reflective of this longer time period is to take account of the likely timescale for delivery.

3.18 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.

3.19 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.

3.20 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.

3.21 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.

3.22 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.

3.23 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 Framework 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.

3.24 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.

3.25 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.

3.26 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.

3.27 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.

3.28 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.

3.29 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.

3.30 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”.

3.31 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.

3.32 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 framework also states that the planning system should actively manage growth patterns in support of these objectives.

3.33 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

3.34 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

3.35 The relevant national PPPs under this topic are:

- 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

3.36 The relevant national PPPs under this topic are:

- 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)

3.37 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 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

3.38 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

3.39 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

3.40 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

3.41 The relevant national PPPs under this topic are:

- 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

3.42 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

3.43 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).

3.44 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

3.45 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.

3.46 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.”

3.47 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.

3.48 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.

3.49 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.

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

Key Sustainability Issues for Exeter City and their Likely Evolution in the Absence of the Exeter Plan

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

3.52 It is also a requirement of the SEA Directive 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 below in relation to each of the key sustainability issues.

Population, Health and Wellbeing

Key Sustainability Issue

3.53 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.

3.54 There is also an increasing need for primary provision and secondary education in future years due to a significant increase in births and migration into the City in recent years.

3.55 There are inequalities related to life expectancy and overall deprivation within Exeter which could be exacerbated by the COVID-19 pandemic.

Likely Evolution of the Issue without the Exeter Plan

3.56 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.

3.57 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

3.58 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

3.59 The new Exeter Plan and related transformational housing delivery programme 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

3.60 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

3.61 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

3.62 Exeter has a low business density due to a dominance of larger employers.

3.63 Uncertainty exists over what the economic impacts of Britain's exit from the EU and the COVID-19 pandemic will be.

Likely Evolution of the Issue without the Exeter Plan

3.64 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.

3.65 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

3.66 Exeter continues to see rising 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

3.67 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.

Biodiversity

Key Sustainability Issue

3.68 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

3.69 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

3.70 Poorly planned development could adversely affect some of Exeter's heritage assets.

Likely Evolution of the Issue without the Exeter Plan

3.71 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

3.72 The landscape setting of the City could be adversely affected by inappropriate development.

Likely Evolution of the Issue without the Exeter Plan

3.73 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

3.74 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.

3.75 There are continued high CO₂ emissions from transport.

Likely Evolution of the Issue without the Exeter Plan

3.76 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.

3.77 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.

3.78 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.

3.79 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

3.80 There are small areas of Grade 3 agricultural land, and small areas in the south east of Grades 1 and 2.

3.81 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.

3.82 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

3.83 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.

3.84 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.

3.85 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.

3.86 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

3.87 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 overleaf.

3.88 The context for the appraisal of options for the Exeter Plan 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.

3.89 As a result of the Scoping consultation, a small number of changes have been made to some of the SA objectives in the SA framework since 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 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 to date.

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 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 due to new development. 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
SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change	+/-?	-?	-?	+/-?
SA Objective 2: To provide a suitable supply of high quality housing including an appropriate mix of types and tenures	+	--	--	--
SA Objective 3: To support the sustainable and diverse growth of the City's economy and maximise employment opportunities	+	--	--	--
SA Objective 4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities	+	+/-	+	+
SA Objective 5: Promote high quality design in new development and improve the character of the built environment	+?	+/-?	+/-?	+/-?
SA Objective 6: To support community cohesion and safety	+	+/-	+	+
SA Objective 7: To provide good access to services, facilities and education	+	+/-	+	+
SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives	+	-	-	-
SA Objective 9: To protect residential amenity by reducing air, noise and light pollution	+/-?	-?	-?	+/-?
SA Objective 10: To conserve and enhance biodiversity and geodiversity	-?	--?	-?	-?

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SA Objective	Option A	Option B	Option C	Option D
SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape	-?	--?	-?	-?
SA Objective 12: To conserve and enhance the historic environment including the setting of heritage features	--?	-?	-?	-?
SA Objective 13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources	--?	-?	-?	-?
SA Objective 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 are being considered for allocation in the Exeter Plan. A total of 87 residential sites and 42 mixed use 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 Outline Draft Plan. Through the Draft Local Plan, an additional 20 sites have been appraised which includes three sites that were revised since the Outline Draft Plan.

5.3 The likely effects of each site option are presented in Table 5.1 for residential sites and Table 5.2 for mixed use sites. Justification for the identified effects is summarised by each SA objective below. The site assessment criteria have been updated to allow for a 5% overlap threshold with open space/sports facilities; 5% overlap threshold with 20% most deprived areas and a 5% overlap threshold with green infrastructure has been included when assessing site options in relation to SA Objectives 4, 6 and 10 respectively. This change was made to address the fact that it became apparent that a small number of sites were being shown by the GIS data as overlapping with these features, whereas in reality they are adjacent but minor inaccuracies with the GIS datasets show them as very slightly overlapping. The application of a 5% buffer means that only sites where there is a genuine overlap are shown as overlapping in the SA. This has resulted in some changes to the SA findings for some site options that were already assessed at the previous stage of the SA.

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

5.4 SA Objective 1 was scoped out of the appraisal of residential, mixed use 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

5.5 Minor positive effects are expected for all 87 residential site options, as they would all deliver fewer than 100 or more homes, therefore making some, but not an individually significant, contribution to the total housing requirement of Exeter City. 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.

5.6 All of the 42 mixed use sites are expected to have significant positive effects, as they will all comprise 100 dwellings or more. It is expected that these large mixed use sites will be able to offer a wide mix of housing, including affordable housing, as well as making a good contribution towards local housing

needs. However, the positive effects will be uncertain depending on how much of the site is used for residential development as opposed to other uses.

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

5.7 The majority of 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 seven existing employment sites (Site ID: 54, 68, 118, 120, 122, 123 and 124) which are predominantly located in the Marsh Barton industrial estate, as having good suitability for employment use. These sites have all been appraised as reasonable alternative residential site options and all are expected to have significant negative effects in relation to SA Objective 3, as the existing employment uses would be converted to residential.

5.8 Minor positive effects are expected for all mixed use sites in relation to SA Objective 3, as all sites will positively contribute 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. However, eight mixed use site options (Site ID: 14, 52, 53, 89, 102, 113, 121 and 136) 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 are to be retained.

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

5.9 A total of 85 residential sites options are expected to have positive effects on SA Objective 4, with 51 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 two residential site options (Site ID 92 and 93) are expected to have minor negative effects as neither are 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 recent work for the new Parks and Greenspace Strategy 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 most having significant positive effects. However, 11 of the residential sites and 6 of the mixed use sites 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 are in fact lost to new development.

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

5.10 SA Objective 5 was scoped out of the appraisal of residential and mixed use 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

5.11 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 10 residential and nine mixed use 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 a small area to the south-east of the Royal Devon and Exeter Hospital. All other residential and mixed use 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

5.12 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 20 of the residential site options and 6 of the mixed use site options, are expected to have a minor negative effect for these reasons.

5.13 The remaining site options varied in their expected effects on SA Objective 7, with many sites having mixed positive and negative scores. 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. Sixteen of the residential site options and ten of the mixed use site options are expected to have significant positive effects overall due to being within close proximity to services, facilities and education provision.

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

5.14 The majority of all the residential and mixed use site options are expected to score positively against SA Objective 8, with 39 residential sites and 12 mixed use sites expected to have minor positive effects and the remaining sites expected to have significant positive effects, as the majority of 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 one residential site (Site ID 92) scored minor negative effect as the site is 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

5.15 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. Thirty nine residential site options are expected to have significant negative effects, as 34 are within 100m of the AQMA and five sites are adjacent to the M5. Similarly, 20 mixed use site options are expected to have significant negative effects as 15 are within 100m of the AQMA and five are adjacent to the M5. The negative effects for the sites adjacent to the M5 are uncertain as noise exposure could potentially be reduced through mitigation. It is recommended that if any of these sites are taken forward for allocation in the Exeter Plan, a requirement for appropriate mitigation should be built into any associated site allocation policies. 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

5.16 Exeter contains a rich variety of wildlife habitats due to a combination of geology/topography and geography combined with enlightened protection and enhancement. This together with the locations of the reasonable alternative site options has resulted in the majority of residential and mixed use sites having likely negative effects (minor or significant) on SA Objective 10 because as a minimum they are within 250m of a locally designated biodiversity or

geodiversity site, or are between 250m and 1km of a designated site. Twenty nine of the residential sites and 16 mixed use sites could have significant negative effects as they are within 250m of a nationally or internationally designated site or the site options contain an existing green infrastructure asset that could be lost as a result of new development. For example, this includes sites (e.g. Site ID: 84-86) that are within 250m of the Exe Estuary which is designated as a RAMSAR site, Special Protection Area and a Site of Special Scientific Interest.

5.17 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, 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.

5.18 If any of these sites are allocated in the Exeter Plan, it is recommended that consideration is 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.

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

5.19 The likely effects of the options on the landscape have been assessed drawing from the landscape sensitivity study that has been carried out by Exeter City Council. Fifteen residential and 13 mixed use sites 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 other 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

5.20 All of the residential and mixed use site options are expected to have negative effects on SA Objective 12 (minor or significant) due to being within at least 1km of a designated heritage asset. This is not surprising as Exeter possesses a wealth of historic assets both within and outside of the historic core of the City. These negative effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development and nearby heritage assets. The current SA findings will be updated to take into account additional heritage site considerations when available. This will be presented in a later version of the SA report.

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

5.21 Approximately half of the residential and mixed use site options are expected to have negligible effects on SA Objective 13, while the other half are expected to have negative effects, predominantly significant negative. 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.

5.22 None of the residential or mixed use 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 the sites with potential significant negative effects associated with flood risk are taken forwards for allocation in the Exeter Plan it is recommended that mitigation requirements are built into any associated site allocation policies, for example the incorporation of SuDS. Where only part of a site is in an area of higher flood risk, consideration should 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

5.23 The majority of land within Exeter City is classed as in urban use. However, 12 residential 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. Twenty nine residential site options are expected to have significant negative effects as they are predominantly mainly or entirely greenfield land located within Grade 1 and/or 2 agricultural land in the south-east (e.g. Site ID 96-99). However, 46 residential sites 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.

5.24 Twenty three mixed use sites are expected to have significant positive effects as they are located on brownfield land. A further 17 mixed use sites are expected to have significant negative effects as they predominantly comprise Grade 1 agricultural land. If these sites are taken forward for allocation in the Exeter Plan, the resulting negative effect will not be able to be mitigated.

5.25 Only one mixed use site option (Site ID 14) is located within a Mineral Safeguarding Area (MSA) and is therefore expected to have a minor effect due to the potential to sterilise minerals resources. All other residential and mixed use sites 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

5.26 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 nine mixed use site options are expected to have significant negative effects across five or more SA Objectives (residential Site ID: 55 and mixed use Site ID: 12, 15, 28, 34, 39, 88, 89, 97 and 138). If any of these site options are taken forward in the Exeter Plan, particular consideration should be given to mitigation. Of these sites, five mixed site options (Site ID: 12, 28, 88, 97 and 138) currently have the fewest significant positive effects and are the worst performing sites overall.

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

Site ID	Site Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
2	Landing lying east of St Andrews Road	0	+	0	++	0	0	++/-?	++	--/0	0	--?	--?	--/0	-/0
4	Land at Redhills (North), Exwick Lane, Exeter	0	+	0	+	0	0	+/+?	+	0	0?	--?	--?	0	--?/0
5	Land at Lugg's Farm, Redhills (South), Exeter	0	+	0	+	0	0	+/-?	+	0	--?	--?	--?	0	--?/0
7	Merrivale Road	0	+	0	++	0	0	++/++?	++	--/0	-?	0?	--?	0	++/0
9	Flowerpot Lane Car Park, Flowerpot Lane	0	+	0	++	0	0	++/++?	++	--/0	-?	0?	--?	--/0	++/0
10	Okehampton Street Car Park, Okehampton Street, Exeter	0	+	0	++	0	0	++/++?	++	--/0	-?	0?	--?	--/0	++/0
11	Land at Ide House	0	+	0	++	0	0	-/-?	+	0	--?	--?	--?	0	--?/-0
13	Land at Taunton Close	0	+	0	+	0	0	+/+?	+	0	0?	0?	--?	--/0	++/0
17	Land at Shillingford Road, Exeter	0	+	0	++	0	0	-/-?	+	0	0?	0?	-?	0	--/0
18	Land adjoining Silverlands, Chudleigh Road	0	+	0	++	0	0	-/-?	+	0	0?	0?	--?	--/0	--/0
20	Land at Bellenden, Wrefords Lane, Exeter	0	+	0	+	0	0	-/-?	+	0	--?	--?	-?	0	--?/0
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, Exeter	0	+	0	++	0	0	++/ ?	++	--/0	--?	0?	--?	0	-/0
24	99 Howell Road, Exeter	0	+	0	++	0	0	++/-?	++	--/0	-?	0?	--?	-/0	++/0
25	Bystock Terrace Car Park, Queens Terrace, Exeter	0	+	0	++	0	0	++/++?	++	--/0	-?	0?	--?	0	++/0
26	Land at Exeter Squash Club, Prince of Wales Road	0	+	0	++/--?	0	0	++/-?	++	0	--?	0?	--?	0	++/0
27	Wynford Road	0	+	0	++	0	0	++?/+	++	0	0?	0?	-?	0	++/0
30	Beacon Lane Garages	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, Exeter	0	+	0	+	0	0	+/+?	+	0	0?	--?	-?	-/0	--?/0
36	Woolsgrove, Church Hill	0	+	0	++	0	0	+/+?	++	0	0?	--?	--	0	--?/0

Site ID	Site Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
37	Land at Home Farm	0	+	0	+	0	0	+/?	++	0	--?	--?	--?	0	--?/0
41	Land between St Annes Well Brewery and Exeter College, Lower North Street, Exeter	0	+	0	++	0	0	++/?	++	--/0	--?	0?	--?	-/0	++/0
43	Mary Arches Multi-Storey Car Park, Mary Arches Street, Exeter	0	+	0	++	0	0	++/?	++	--/0	-?	0?	--?	0	++/0
44	Mecca Bingo, 12 North Street, Exeter	0	+	0	++	0	0	++/?	++	--/0	-?	0?	--?	0	++/0
45	Smythen Street Car Park, Smythen Street, Exeter	0	+	0	+	0	+	++/-?	++	--/0	-?	0?	--?	0	++/0
47	Cathedral and Quay Car Park, Lower Coombe Street, Exeter	0	+	0	++/--?	0	+	++/-?	++	--/0	-?	0?	--?	--/0	++/0
48	Magdalen Street Car Park, Exeter, Devon	0	+	0	++	0	+	++/-?	++	--/0	-?	0?	--?	0	++/0
49	Land at New North Road, Exeter	0	+	0	++/--?	0	0	++/?	++	--/0	--?	0?	--?	0	-/0
50	Howell Road Car Park, Howell Road, Exeter	0	+	0	++	0	0	++/?	++	--/0	-?	0?	--?	--/0	++/0
51	12-31 Sidwell Street, Exeter	0	+	0	++	0	0	++/?	++	--/0	-?	0?	--?	0	++/0
54	Triangle Car Park, Russell Street, Exeter	0	+	--?/0	++	0	+	++/?	++	--/0	0?	0?	--?	--/0	++/0
55	Pyramids Leisure Centre, Heavitree Road, Exeter	0	+	0	++/--?	0	+	++/?	++	--/0	--?	0?	--?	--/0	++/0
56	Parr Street Car Park, Parr Street, Exeter	0	+	0	++	0	+	++/?	++	--/0	0?	0?	--?	0	++/0
58	Fairbanks, 90 Polsloe Road, Exeter	0	+	0	++	0	0	++/?	++	--/0	0?	0?	--?	0	++/0
60	Land at Hamlin Lane, Exeter	0	+	0	+	0	0	+/-?	++	--/0	0?	0?	-?	--/0	-/0
61	Land between 106 Hamlin Gardens and 65 Carlyon Gardens	0	+	0	++	0	0	+/-?	++	0	-?	0?	-?	0	++/0
63	Clifford Close, Exeter	0	+	0	++	0	+	++?/+	++	0	0?	0?	-?	--/0	++/0
66	Land at Cumberland Way, Exeter	0	+	0	++	0	0	++?/+	++	0	0?	0?	--?	0	--/0
67	Grenadier Emperor, Grenadier Road	0	+	0	++	0	0	++/-?	++	0	0?	0?	--?	--/0	--/0
68	Grenadier Emperor, Grenadier Road	0	+	--?/0	+	0	0	-/-?	+	--?/0	0?	0?	--?	--/0	--/0
69	Magdalen Street Car Park, Magdalen Street, Exeter	0	+	0	++/--?	0	0	++/-?	+	--/0	0?	0?	--?	--/0	++/0
70	Land known as Mount Radford Lawn	0	+	0	++/--?	0	0	++/?	+	--/0	0?	0?	--?	0	-/0

Site ID	Site Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
71	Gordons Place Car Park, Gordons Place	0	+	0	++	0	0	+/+?	+	--/0	0?	0?	--?	0	++?0
72	Belle Isle Depot, Belle Isle Drive, Exeter	0	+	0	+	0	0	++?/-	+	0	--?	--?	--?	--/0	++/0
73	91-97 Wonford Street	0	+	0	++	0	+	+/-?	+	0	0?	0?	--?	-/0	++/0
75	Chestnut Avenue	0	+	0	++/--?	0	+	++?/+	+	0	--?	--?	-?	0	-/0
76	Bishop Westall Road	0	+	0	--/+?	0	0	+/+?	+	0	--?	0?	-?	0	--/0
77	Land off Ringswell Avenue	0	+	0	++	0	0	++?/-	+	0	0?	0?	-?	0	-/0
79	Park and Ride Site, Digby Drive	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
81	Land Adjacent Tesco Store, Russell Way, Exeter.	0	+	0	+	0	0	-/-?	++	0	--?	0	--?	-/0	--/0
82	Russell Way, Exeter.	0	+	0	+	0	0	-/+?	++	0	--?	0?	--?	--/0	--/0
84	Garages at Lower Wear Road	0	+	0	+	0	0	+/+?	+	0	--?	0?	--?	-/0	++/0
85	Land to the east side of Glasshouse Lane, Exeter	0	+	0	--?/+	0	0	-/+?	+	0	--?	0?	--?	-/0	-/0
86	Wear Barton Playing Fields, Wear Barton Road, Exeter	0	+	0	--?/+	0	0	-/+?	+	0	--?	0?	--?	0	-/0
91	Land at Newcourt Road, Topsham	0	+	0	+	0	0	-/+?	+	--?/0	-?	-?	--?	0	--/0
92	Land east of Newcourt Road, Topsham	0	+	0	-	0	0	-/-?	-	0	-?	-?	--?	0	--/0
93	Yeomans Gardens, Newcourt Road, Topsham	0	+	0	-	0	0	-/-?	++	0	-?	-?	-?	0	--/0
94	Land west of Newcourt Road, Topsham	0	+	0	+	0	0	+/-?	++	0	-?	-?	--?	-/0	--/0
95	Land at Topsham Golf Academy	0	+	0	--?/+	0	0	+/-?	++	0	--?	-?	--?	0	--/0
96	Land at Clyst Road, Topsham	0	+	0	+	0	0	-/-?	+	0	--?	-?	--?	0	--/0
98	Land on the south side of Monmouth Street, 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, Exeter	0	+	0	++	0	0	++?/+	++	--/0	-?	0?	--?	0	++/0
101	182-184, 185-186 Fore Street and 3-6 North Street, Exeter	0	+	0	++	0	0	++?/+	++	--/0	-?	0?	--?	0	++/0

Site ID	Site Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
103	Clarendon House, Western Way, Exeter	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, Exeter	0	+	0	++	0	0	+/?	++	0	0?	0?	--?	0	--/0
107	Land south of Gypsy Hill Lane, Exeter	0	+	0	++	0	0	-/?	++	--?/0	0?	0?	--?	0	--/0
108	Hessary, Hollow Lane, Exeter	0	+	0	++	0	0	++?/-	++	0	0?	0?	-?	0	--/0
110	88 Honniton Road, Exeter	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
115	Land at Retreat Drive, Topsham	0	+	0	+	0	0	-/?	+	--?/0	--?	0?	--?	0	++/0
118	Links House, 156 Grace Road Central, Marsh Barton, Exeter	0	+	--/?0	+	0	0	-/?	+	0	0?	0?	-?	--/0	++/0
119	Falcon House, Falcon Road, Exeter	0	+	0	+	0	0	-/?	++	0	-?	0?	-?	--/0	++/0
120	22 Marsh Green Road, Exeter	0	+	--?/0	+	0	0	-/+?	+	0	0?	0?	-?	--/0	++/0
122	1-9 Alpin Brook Road, Exeter	0	+	--?/0	++	0	0	-/+?	+	0	0?	0?	--?	--/0	++/0
123	CP Arts, Alphin Brook Road, Marsh Barton Trading Estate, Exeter	0	+	--?/0	+	0	0	-/?	+	0	0?	0?	-?	--/0	++/0
124	1-5 Elm Units, Grace Road South, Marsh Barton Trading Estate, Exeter	0	+	--?/0	+	0	0	-/?	+	0	0?	0?	-?	--/0	++/0
125	Land behind 66 Chudleigh Road, Exeter	0	+	0	++	0	0	-/?	+	--/0	0?	0?	--?	--/0	--/0
127	Knowle Hill, Dawlish Road, Exeter	0	+	0	+	0	0	-/?	+	0	0?	--?	--?	0	--/0
129	Newbery Car Breakers, Exeter	0	+	0	+	0	0	-/?	+	0	0?	--?	--?	0	++/0
132	Larkbeare House, Larkbeare Road, Exeter	0	+	0	++	0	0	++?/+	+	--/0	--?	0?	--?	--/0	-/0
133	Matford Huts, Exeter	0	+	0	++	0	0	++?/+	+	--/0	--?	0?	--?	--/0	-/0
144	Toby Carvery & Innkeeper's Collection, Exeter	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	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
1	Hamlyns Farmhouse & Hamlyns Farm, St Andrews Road	0	++?	+	+	0	0	++/-?	++	0	--?	--?	--?	--/0	-/0
6	Land on the west side of Barley Lane, Exeter	0	++?	+	+	0	0	+/-?	+	0	--?	--?	-?	-/0	--?/0
12	Oaklands Riding School and The Rosary, Balls Farm Road, Exeter	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, Exeter	0	++?	+	+	0	0	++/+?	++	0	-?	0?	--?	--/0	++/0
22	Red Cow / St Davids	0	++?	+	++	0	0	++/-?	++	--/0	-?	0?	--?	--/--?	++/0
28	Land north of Exeter	0	++?	+	--?/+	0	0	++/+?	+	0	--?	--?	-?	--/0	--?/0
29	Land at Pendragon Road, Exeter	0	++?	+	+	0	+	++/+?	+	0	--?	--?	-?	--/0	--?/0
34	Gray's Barn, Church Hill, Exeter	0	++?	+	++	0	0	++/+++?	+	0	--?	--?	--?	--/--?	--?/0
39	West Gate	0	++?	+	++/--?	0	+	++/+?	++	--/0	--?	--?	--?	--/--?	++/0
40	Exbridge House, 26 Commercial Rd, Exeter	0	++?	+	+	0	+	++/-?	++	--/0	--?	0?	--?	--/--?	++/0
42	North Gate	0	++?	+	++	0	0	++/+?	++	--/0	--?	0?	--?	--/0	++/0
46	South Gate	0	++?	+	++/--?	0	+	++/-?	++	--/0	-?	0?	--?	--/0	++/0
52	East Gate	0	++?	--?/+	++	0	+	++/+?	++	--/0	-?	0?	--?	--/0	++/0
53	Bus and Coach Station	0	++?	--?/+	++	0	+	++/+?	++	--/0	-?	0?	--?	-/-	++/0
64	Whipton Community Hospital, Hospital Lane, Exeter	0	++?	+	++	0	0	++/+?	+	0	0?	0?	--?	0	++/0
83	Land at 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
89	Sandy Gate	0	++?	+/?	++	0	0	++/+++?	++	0/--?	--?	0?	--?	--/0	++/0
90	Land at Sandy Park	0	++?	+	+	0	0	-/+?	++	0/--?	0?	0?	--?	--/0	--/0

Site ID	Site Name	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
97	Land to the east of Clyst Road, Topsham	0	++?	+	++/--?	0	0	+/-?	++	0	-?	--?	--?	--/--?	--/0
102	Civic Centre, Paris Street	0	++?	+/--?	++/--?	0	+	++/+?	++	--/0	-?	0?	--?	0	++/0
104	Former Police Station and Central Devon Magistrates' Court, The Court House, Heavitree Road, Exeter	0	++?	+	++	0	+	++/+?	++	--/0	0?	0?	--?	0	++/0
109	Land to the north, south and west of the Met Office, Hill Barton, Exeter	0	++?	+	++	0	0	-/++?	++	0	0?	0?	-?	--/0	--/0
111	Sowton Park and Ride, Sidmouth Road	0	++?	+	+	0	0	-/++?	++	0	-?	0?	-?	--/0	++/0
113	Land south of the A379, Exeter	0	++?	--?/+	+	0	0	-/-?	++	0	--?	0?	-?	0	--/0
117	Isca House, Haven Road, Exeter	0	++?	+/0?	+	0	0	++/-?	++	0	0?	--?	--?	--/0	++/0
121	RGB Exeter, Alphinbrook Road, Marsh Barton, Exeter	0	++?	--?/+	++	0	0	-/+?	+	0	0?	0?	--?	-/0	++/0
126	Aldens Farm West, Alphington	0	++?	+	++	0	0	-/-?	+	0	0?	0?	--?	0	--/0
128	Land west of Barley Lane (2), Exeter	0	++?	+	+	0	0	+/-?	+	0	--?	--?	-?	--/--?	--?/0
130	Vulcan Works, Water Lane, Exeter	0	++?	+/0?	+	0	0	++?/+	++	0	0?	0?	--?	--/0	++/0
131	Exbridge House, 26 Commercial Road (2), Exeter	0	++?	+	+	0	+	++?/-	++	--/0	--?	0?	--?	--/--?	++/0
134	Land north of Exeter / Land at Stoke Hill (2), Exeter	0	++?	+	+	0	0	-/+?	+	0	-?	--?	-?	--/0	--?/0
135	Motorway Services, Sowton	0	++?	+	+	0	0	-/-?	++	--?/0	-?	0?	--?	--/0	++/0
136	Land adjacent Ikea, Newcourt	0	++?	--?/+	+	0	0	-/-?	++	0	0?	0?	-?	0	--/0
138	Land east of Clyst Road, Topsham (2)	0	++?	+	++/--?	0	0	+/-?	++	0	--?	--?	--?	0	--/0
139	Residual Land at Newcourt	0	++?	+	+	0	0	-/+?	++	--?/0	0?	0?	--?	0	--/0
140	Land north of Old Rydon Lane, Exeter	0	++?	+	+	0	0	-/-?	++	0	0?	0?	--?	0	--/0
141	St Luke's Campus, Heavitree Road, Exeter	0	++?	+	++	0	0	++?/+	++	--/0	0?	0?	--?	--/0	++/0
142	West Gate (2), Exeter	0	++	+	++	0	0	++?/+	+	--/0	-?	0?	--?	--/0	++/0
143	Land at Cowley Bridge Road, Exeter	0	++?	+/0?	+	0	0	-/-?	+	--/0	0?	0?	--?	--/0	++/0

Chapter 6

Sustainability Appraisal Findings for the Draft Plan

6.1 This chapter sets out the assessments of the policies included in the Full Draft 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 consultation document. Consideration is given to the likely cumulative effects of the Full Draft Plan at the end of this chapter. The work in this chapter builds on the appraisal work that was carried out previously for the Outline Draft Plan. The Full Draft Plan builds on that document and includes new policies as well as amended versions of policies included previously. Therefore, the appraisal work in this chapter for policies that were included in the Outline Draft Plan has been updated to reflect any changes to those policies, and the new policies have now also been appraised.

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 Outline Draft Plan, which were considered by the Council in the final version of that document. These are set out at the end of the chapter along with the Council’s response, along with a number of new recommendations which are now made in relation to the current Full Draft Plan.

Objectives

6.5 This section presents the appraisal of the objectives set out in the Full Draft 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 and work towards creating a carbon neutral city. Helping to deliver the strategic priority of a net zero carbon city.
2. **Homes:** Provide the quantity, type and quality of homes that Exeter needs in the right locations. Helping to deliver the strategic priorities of building great neighbourhoods and promoting active and healthy lifestyles.
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. Helping to deliver the strategic priorities of delivering a prosperous local economy and a net zero city.
4. **The Future of our High Streets:** Enhance the vitality of the city centre and our other high streets so they continue to provide a key role in our day-to-day lives supporting communities, prosperity and cultural identity. Helping to deliver the strategic priority of a prosperous local economy.
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. Helping to deliver the strategic priorities of a net zero carbon city, a healthy and active city, housing and building great neighbourhoods and communities.

6. **Natural Environment:** Protect and enhance the city's unique natural setting provided by the hills, the valley parks and River Exe, improve access to natural greenspaces and provide net gains for biodiversity. Helping to deliver the strategic priorities of a net zero carbon city, a healthy and active city, housing and building great neighbourhoods and communities.
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. Helping to deliver the strategic priority of building great neighbourhoods.
8. **Culture and Tourism:** Explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination. Helping to deliver the strategic priority of thriving culture and heritage.
9. **High Quality Places and Design:** Deliver the development we need in high quality, liveable, connected places. Helping to deliver the strategic priorities of net zero carbon city, a healthy and active city, housing and building great neighbourhoods and communities and thriving culture and heritage.
10. **Health and Wellbeing:** Promote inclusive development which supports communities in becoming healthier and helps Exeter to become the most active city in the UK. Helping to deliver the strategic priorities of a healthy and active city, a net zero carbon city, housing and building great neighbourhoods and communities.
11. **Infrastructure and Community 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. Helping to deliver the strategic priorities of a prosperous local economy, a healthy and active city, housing and building great neighbourhoods and a net zero carbon city.

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	Objective 2	Objective 3	Objective 4	Objective 5	Objective 6	Objective 7	Objective 8	Objective 9	Objective 10	Objective 11
SA1: Climate Change	++	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	+	+	++	+
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	+
SA14: Resources	0	0	0	0	0	0	0	0	0	0	0

Climate Emergency

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 creating a carbon neutral 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 and quality of homes that Exeter needs. Therefore, a significant positive effect is expected in relation to SA Objective 2: Housing. A minor positive effect is also expected in relation to SA Objective 4: Health because the objective supports the promotion of active and healthy lifestyles, which will have beneficial effects on people's health in general. 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 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 objective refers to the delivery of a net zero city, and therefore a minor positive effect is also expected in relation to SA Objective 1: Climate Change.

The Future of our High Streets

6.11 The fourth Exeter Plan objective relates to the future of high streets and sets out that the Plan aims to enhance the vitality of the city centre and other local high streets, 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 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 high streets and the city centre 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 and high streets 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 delivering the strategic priorities of 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 access to natural greenspaces and provide 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. A minor positive effect is also expected in relation to SA Objective 1: Climate Change as this objective supports the protection and enhancement of the green and blue infrastructure network, which will help deliver a net zero Exeter.

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, and deliver high quality and appropriate development for the local context.

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 minor positive but uncertain 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 achieving a net zero Exeter 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. A minor positive effect is also expected against SA Objective 1: Climate Change because the objective refers to delivering the strategic priorities of a net zero Exeter.

Infrastructure and Community Facilities

6.18 The final Exeter Plan objective focuses on the delivery of new infrastructure for communities, 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 the city's 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.

Strategy

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

- Policy S1: Spatial Strategy
- Policy S2: Liveable Exeter Principles

6.22 In terms of reasonable alternatives, the likely effects of the alternative options to Policy S1 were appraised and the findings 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 Sustainable Appraisal 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 Strategy Policies

SA Objectives	Policy S1	Policy S2
SA1: Climate Change	+/-?	+
SA2: Housing	++	+
SA3: Economic Growth	++	+
SA4: Health	+	++
SA5: Design and Built Environment	+	++
SA6: Community	+	++
SA7: Services, Facilities and Education	+	+
SA8: Sustainable Travel	++	+
SA9: Pollution	+/-?	+

SA Objectives	Policy S1	Policy S2
SA10: Biodiversity and Geodiversity	-?	+/-?
SA11: Landscape	-?	+/-?
SA12: Cultural Heritage	-?	+/-?
SA13: Water	-?	+/-?
SA14: Resources	+/-?	+/-?

Policy S1: Spatial Strategy

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 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 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, district centres, local centres and key 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 on foot. The policy also requires proposals to deliver the range of infrastructure 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, district centres, local centres and key public transport hubs with good access to green infrastructure. 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, 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. Therefore, minor negative effects are identified in relation to SA Objective 10: Biodiversity and Geodiversity and SA Objective 11: Landscape. 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 include mitigation, seeking to protect the ecological value of the River Exe, wildlife networks and the landscape value of sensitive hills and conserving and enhancing the historic environment. Therefore, minor negative effects 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

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 seeking to make efficient use of land so that Exeter remains compact and walkable. 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 incorporate innovative solutions within 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.

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 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 biodiversity gains and maximise opportunities for landscaping and planting.

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
- Policy CC2: Renewable and low carbon energy
- Policy CC3: Local energy networks
- Policy CC4: Ground-mounted photovoltaic arrays
- Policy CC5: Future development standards
- Policy CC6: Embodied carbon
- Policy CC7: Solar-ready development
- Policy CC8: Flood risk

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	-	-	0	0	-
SA3: Economic Growth	+	+	+	+	-	+/-	+?	0	0
SA4: Health	+	+	0	++	0	0	0	+	0
SA5: Design and 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	+	+	+	+	0	+
SA10: Biodiversity and Geodiversity	+	+	0	0	0	0	0	0	++
SA11: Landscape	+	+	0	0	0	0	0	0	0
SA12: Cultural Heritage	+?	+	0	0	0	0	0	0	0

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SA Objectives	Policy CC1	Policy CC2	Policy CC3	Policy CC4	Policy CC5	Policy CC6	Policy CC7	Policy CC8	Policy CC9
SA13: Water	+	0	0	0	0	0	0	++	++
SA14: Resources	0	0	0	++	0	0	0	0	++

Policy CC1: Net zero Exeter

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 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 and minimise travel by car, maximising walking, 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.

6.41 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. The policy does not specify how walking, cycling and use of public transport will be maximised, but one way in which this could be achieved is by ensuring services and facilities are within close proximity of one another. 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. The policy does not specifically protect the historic environment but 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 will 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

6.48 Policy CC2: Renewable and low carbon energy 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. However, the policy outlines that energy-generating development that is neither renewable nor low carbon will not be permitted, which could restrict development. 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:

- 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

6.54 Policy CC3: Local energy networks 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 the policy requires all new development (including employment development), to have heating (water and space) systems that are compatible with the local energy network, helping to reduce reliance on energy from elsewhere that may not be as low carbon.

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. 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 significant 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. Therefore, a minor positive effect is identified for the policy in relation to 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 historic 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 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. Uncertain mixed significant positive and significant 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. However, Reasonable Alternative 2 would not include the protection of assets such as agricultural resources, landscape, historic environment, biodiversity and areas of open space and recreation, though their harm depends on the development, therefore, uncertain minor negative effects are expected in relation to SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape, SA Objective 12:

Cultural Heritage and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

Policy CC5: Future development standards

6.69 Policy CC5: Future development standards 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. 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 negative 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 may impact upon the ability to supply an appropriate quantity of housing and employment development to satisfy demand. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.71 There are two reasonable alternatives to Policy CC5: Future development standards 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. A less restrictive policy would be less likely to impact the ability to supply the appropriate level of housing and employment. However, Reasonable Alternative 1 would still introduce future development standards. Therefore, minor negative effects are still expected regarding SA Objective 2: Housing and SA Objective 3: Economic Growth. 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 negative effect is expected in relation to SA Objective 2: Housing as the introduction of the requirements outlined in the policy may impact the ability of the City Council to supply an appropriate quantity of housing to satisfy demand.

6.76 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.

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: Solar-ready development

6.81 Policy CC7: Solar-ready development is expected to have an uncertain minor positive effect in relation to SA Objective 1: Climate Change as the policy requires all major development to have the physical capacity for solar panel installation. This will increase Exeter's ability to produce renewable energy and thus the potential of reducing Exeter's carbon dioxide emissions. The policy will help lower air pollution by enabling the mitigation of carbon dioxide emissions, therefore an uncertain minor positive effect is expected in relation to SA Objective 9: Pollution. There is uncertainty, however, as these effects are somewhat dependent on the future installation of the solar panels.

6.82 An uncertain minor positive effect is expected in relation to SA Objective 3: Economic Growth as requirements for all major development to have the physical capacity for solar panel installation will help enable the achievement of a low carbon economy. There is uncertainty however as this is somewhat dependent on the future installation of the solar panels.

6.83 Increasing the capacity of major development for solar installation increases the potential for harm to the landscape, townscape and historic environment of Exeter, although, the policy requires development to not have unacceptable impacts upon the natural, historic and built environment. Therefore, negligible effects are expected in relation to SA Objective 11: Landscape and SA Objective 12: Cultural Heritage. However, these are uncertain as this is somewhat dependent on the future installation of the solar panels.

6.84 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.85 There is one reasonable alternative to Policy CC7: Solar-ready development:

- Reasonable Alternative 1: More restrictive policy – A prescriptive policy could risk lower insulation levels in the fabric which would not be viable to retrofit at a later date, unlike PV panels which would be easier to retrofit. Prescriptive policies often have unexpected and unwelcome consequences.

6.86 Reasonable Alternative 1 would support the aim of net zero carbon to a greater extent than Policy CC7. A significant positive effect is expected in relation to SA Objective 1: Climate Change, as a more restrictive policy would result in all development to have the physical capacity for solar development which contributes to net zero. An uncertain mixed minor positive and minor negative effect is identified in relation to SA Objective 3: Economic Growth as Reasonable Alternative 1 requires for all major development to have the physical capacity for solar panel installation which will help enable the achievement of a low carbon economy. However, a more restrictive policy may mean that all development, regardless of feasibility or practicality, will be required to be developed for solar capacity and this may impact the ability to supply an appropriate quantity of employment or housing development to satisfy demand. There is uncertainty as this is somewhat dependent on the future

installation of the solar panels. Uncertain minor negative effects are expected in relation to SA Objective 11: Landscape and SA Objective 12: Cultural Heritage as increasing the capacity of major development for solar installation increases the potential for harm to the landscape, townscape and historic environment of Exeter. However, these effects are uncertain as this is somewhat dependent on the future installation of the solar panels. Negligible effects are expected against the remaining SA objectives.

Policy CC8: Flood risk

6.87 Policy CC8: Flood risk 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. The use of SuDS 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. 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.

6.88 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.89 One reasonable alternative has been considered by the Council in relation to Policy CC8: Local Flood risk:

- 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.

6.90 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

6.91 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.

6.92 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.

6.93 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 will help Exeter adapt to climate change, including increasing droughts and flood events.

6.94 A minor negative is expected in relation to SA Objective 2: Housing as the introduction of the requirements outlined in the policy, may impact the ability of to supply an appropriate quantity of housing to satisfy demand. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.95 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 southwest.
- 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.

6.96 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.

6.97 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.

6.98 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

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

- Policy H1: Housing requirement
- Policy H2: Housing allocations and windfalls
- Policy H3: Affordable housing
- Policy H4: Build to rent
- Policy H5: Co-living housing
- Policy H6: Custom and self-build housing
- Policy H7: Specialist accommodation
- Policy H8: Purpose built student accommodation
- Policy H9: Gypsy and traveller accommodation
- Policy H10: Residential conversions and houses in multiple occupation
- Policy H11: Loss of residential accommodation
- Policy H12: Accessible homes
- Policy H13: Housing density and size mix
- Policy H14: Residential amenity and healthy homes

6.100 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
SA1: Climate Change	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	+	0	++	+	+	+	0	++	0	++
SA5: Design and 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
SA8: Sustainable Travel	0	++	0	0	+	0	+	+	+	+	0	0	0	0
SA9: Pollution	0	--	0	0	+	0	+	+	+	0	0	0	0	+
SA10: Biodiversity and Geodiversity	-?	--?	0	0	0	0	0	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	+	0
SA13: Water	-?	--	0	0	0	0	0	0	+	0	0	0	0	0
SA14: Resources	-?	++/--	+	0	0	0	0	0	0	0	0	0	+	0

Policy H1: Housing requirement

6.101 Policy H1: Housing requirements makes provision for 14,124 new homes over the Plan period, which equates to 642 homes per year between 2020 and 2040 plus a headroom of 10%. 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.

6.102 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.103 The following alternatives to Policy H1: Housing requirements 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. A headroom greater than 10% is not considered necessary at this stage. A headroom lower than 10% may not provide sufficient flexibility and is less likely to accord with paragraph 74 of the NPPF, which states that a buffer of 10% should be included in the supply of specific deliverable sites where the local authority wishes to demonstrate a five year supply through the local plan adoption process. 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 H2: Housing allocations and windfalls

6.104 Policy H2: Housing allocations and windfalls 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 almost all 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.

6.105 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.

6.106 Policy H2 is also likely to have a significant negative effect in relation to SA Objective 13: Water, as the River Exe and its tributaries run through Exeter and therefore many sites are entirely or mainly located within Flood Zone 3, in addition to some sites falling within an area with a 1 in 30 year risk of surface water flooding.

6.107 The policy is likely to have a significant negative effect in relation to SA Objective 10: Biodiversity and Geodiversity because Exeter contains a rich variety of wildlife habitats and therefore most 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. In addition, residential development is likely to have an impact on air quality levels within Exeter City. Poor air quality can lead to negative impacts on wildlife and the natural environment. Appropriate mitigation may also help avoid adverse effects and even result in beneficial effects. Overall, therefore, the effect is recorded as uncertain.

6.108 Seven of the sites allocated in policy H2 were found to have potential significant negative effects on the landscape, and a further four sites may have minor negative effects. However, most of the sites allocated in the policy are located outside of the areas of highest landscape sensitivity, and so overall a minor negative effect 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.

6.109 A significant negative effect is also expected in relation to SA Objective 12: Cultural Heritage because all sites are located within close proximity of heritage assets, with some closer than others. As a result, it is very likely that development will have potential adverse effects on the historic environment. The effect is recorded as uncertain because the actual effect will depend on factors such as 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. The current SA findings will be updated to take into account additional heritage site considerations when available and presented in a later version of the SA report.

6.110 A mixed significant positive and significant negative effect is expected in relation to SA Objective 4: Health because although most of the allocated housing sites will provide more than 1,000 new homes or are within close proximity of a healthcare facility and area of open space/sports facility, 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.

6.111 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 brownfield land and their redevelopment will therefore represent an efficient use of previously developed land. However, there are also a similar number of sites that are predominantly greenfield and which are located on best and most versatile agricultural land.

6.112 A significant negative effect is expected against SA Objective 3: Economic Growth to reflect the fact that a small proportion of the allocated mixed-use sites could result in the conversion of existing employment uses to mixed-use, 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. In addition to this, one of the residential allocations was identified as having good suitability for employment use but is proposed for residential development. 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.

6.113 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 do not provide as many new homes and are further from the city centre and district/local centres.

6.114 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.

6.115 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

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

Policy H3: Affordable housing

6.117 Policy H3: Affordable Housing 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 35% of homes are to be affordable on a development with half to be for social rent and the remaining homes to be for affordable rent, First Homes and additional affordable homeownership products. The policy also ensures that the size mix of the affordable housing reflects local need.

6.118 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 a development and built to the same standards and size as market homes. This will help ensure a higher level of standard for affordable homes.

6.119 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.

6.120 The policy states that development which is eligible for Vacant Building Credit must set out 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. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.121 The following alternatives to Policy H3: Affordable Housing have been considered. They are:

- Reasonable alternative 1: No policy – This is not considered appropriate. Paragraph 62 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 a different percentage of affordable housing from major developments – This is not considered appropriate at this stage. 35% reflects the level of need for affordable housing identified in the 2022 Exeter Local Housing Market assessment. However, the percentage may change before the Exeter Plan is submitted for Examination as a result of whole-plan viability testing.
- Reasonable alternative 3: Require a different tenure split of affordable housing – This is not considered appropriate at this stage. The tenure split reflects the level of need for different types of affordable housing identified in the 2022 Exeter Local Housing Market assessment. However, the percentages may change before the Exeter Plan is submitted for Examination as a result of whole-plan viability testing.

6.122 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.

6.123 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 H4: Build to rent

6.124 Considering the narrow focus of Policy H4: Build to rent, it is expected to have mainly negligible effects on the SA objectives. Policy H4 supports the development of build to rent proposals. Therefore, 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.

6.125 A significant positive effect is also expected against SA Objective 5: Design and the Built Environment as the policy requires affordable housing to be fully integrated into a development and built to the same standards and size as market homes. The build to rent housing is also required to be of high quality and designed and built specifically for renting. This will help ensure a higher level of standard for affordable homes.

6.126 A minor positive effect is 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.

Reasonable Alternatives

6.127 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 62 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 a different percentage of affordable housing from Build to Rent 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. 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 H5: Co-living housing

6.128 Policy H5: 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 provide sufficient communal facilities and services to meet the needs of all residents and deliver at least 20% homes for affordable private rent. Therefore, the policy will address the housing needs of more specialist groups, including older people and people with disabilities and a significant positive effect is identified in relation to SA Objective 6: Community.

6.129 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 services, facilities, education and employment areas.

6.130 A 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.

6.131 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.132 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 62 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 H6: Custom and self-build housing

6.133 Policy H6: Custom and self-build housing is expected to have a significant positive effect in relation to SA Objective 2: Housing as supporting

the development of custom and self-build housing will support the development of a mix of types and tenures of properties addressing housing needs including those of specialist groups.

6.134 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. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.135 The following alternatives to Policy H6: Custom and self-build housing have been considered. They are:

- Reasonable alternative 1: No policy – This is not considered appropriate. Paragraph 62 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: Do not allocate sites for custom housebuilding or require a percentage of plots of custom housebuilding on development sites – This is not considered appropriate at this stage. The level of demand expressed by the Council's self-build and custom housebuilding register indicates that it will be necessary to use both measures in order to meet the demand for custom and self-build housing in the city.

6.136 Reasonable alternative 2 would not allocate sites for custom housebuilding or require a percentage of plots of custom housebuilding on development sites. Not allocating sites for custom housebuilding or require a percentage of plots of custom housebuilding on development sites will not provide the mix of types of housing to meet need. Therefore, a minor negative

effect is expected against SA Objective 2: Housing. Negligible effects are expected against the remaining SA objectives.

Policy H7: Specialist accommodation

6.137 Policy H7: Specialist accommodation is expected to have a significant positive effect in relation to SA Objective 2: Housing as the policy supports the development of specialist accommodation 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.

6.138 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; 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.

6.139 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.

6.140 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.141 The following alternatives to Policy H7: Specialist accommodation have been considered. They are:

- Reasonable alternative 1: No policy – This is not considered appropriate. Paragraph 62 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 at this stage, although will be considered before the Exeter Plan is submitted for Examination in light of evidence being developed by Devon County Council.

6.142 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 H8: Purpose built student accommodation

6.143 Policy H8: 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 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.

6.144 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 walking, cycling 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 people with disabilities 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 in healthier lifestyles.

6.145 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.146 The following alternatives to Policy H8: Purpose built student accommodation have been considered. They are:

- Reasonable alternative 1: No policy – This is not considered appropriate. Paragraph 62 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.

6.147 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 H9: Gypsy and traveller accommodation

6.148 Policy H9: 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. The policy will help meet the demands for accommodation for gypsies, travellers and travelling show-people.

6.149 A significant positive effect is identified for SA Objective 7: Services, Facilities and Education as the policy requires accommodation to be located in 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.

6.150 The policy requires development proposals to not cause unacceptable landscape or ecological impact as well as provide suitable environmental quality for the residents. As a result, mixed effects (minor positive and minor negative) are expected in relation to SA Objective 10: Biodiversity and Geodiversity and SA Objective 11: Landscape.

6.151 The policy also requires development proposals to provide suitable sewage and waste management facilities 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.

6.152 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.

6.153 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternative

6.154 The following alternative to Policy H9: Gypsy and traveller accommodation have been considered. They are:

- Reasonable alternative 1: No policy – This is not considered appropriate. Paragraph 62 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 emerging 2023 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 H10: Residential conversions and houses in multiple occupation

6.155 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 a negative impact on the amenity of neighbouring residents. Therefore, minor positive effect is expected for SA Objective 6: Community.

6.156 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. 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.

6.157 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 Article 4 area will not be permitted. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.158 No reasonable alternatives have been considered to Policy H10: Residential conversions and houses in multiple occupation.

Policy H11: Loss of residential accommodation

6.159 Considering its narrow focus, Policy H11 is expected to have mainly negligible effects on the SA objectives. Policy H11 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

6.160 One alternative to Policy H11: 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 will give examples of where a net loss may be considered acceptable.

6.161 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 H12: Accessible homes

6.162 Considering its narrow focus Policy H12 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 adaptable which will help people that are from lower incomes.

Reasonable Alternatives

6.163 The following alternatives to Policy H12: Accessible homes have been considered. They are:

- Reasonable alternative 1: No policy – This is not considered appropriate. Paragraph 62 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 proportions of accessible housing – This is not considered appropriate. The percentages in the policy reflect the level of need for accessible housing identified in the 2022 Exeter Local Housing Market assessment. The supporting text will set out where exceptions to these percentages may be acceptable.

6.164 Reasonable alternative 2 seeks to require different proportions of accessible housing which may not result in Exeter City meeting the required need of accessible housing and type of 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 H13: Housing density and size mix

6.165 Policy H13: Housing density and size mix requires developments of five or more homes to incorporate an appropriate mix of house sizes allowing for a larger variety of types of houses. Therefore, a minor positive effect is expected in relation to SA Objective 2: Housing. 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.

6.166 The policy requires that housing development make efficient use of land while optimising housing density taking into account of 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.

6.167 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.168 No reasonable alternatives have been considered to Policy H13: Housing density and size mix.

Policy H14: Residential amenity and healthy homes

6.169 A significant positive effect is expected against SA Objective 2: Housing as Policy H14 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.

6.170 Policy H14 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 appropriate provision to enable working from home. 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 harm on the amenity of neighbouring residents.

6.171 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.

6.172 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.173 No reasonable alternatives have been considered to Policy H14: Residential amenity and healthy homes.

Economy and Jobs

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

- Policy EJ1: Economic growth in the transformational sectors
- Policy EJ2: Retention of employment land
- Policy EJ3: New forms of employment provision
- Policy EJ4: Access to jobs and skills
- Policy EJ5: Provision of local services in employment areas
- Policy EJ6: New transformational employment allocations

6.175 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	0	+?	0
SA5: Design and Built Environment	0	0	0	0	0	0
SA6: Community	0	0	0	0	0	0
SA7: Services, Facilities and Education	+	0	0	+	+	0
SA8: Sustainable Travel	0	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

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SA Objectives	Policy EJ1	Policy EJ2	Policy EJ3	Policy EJ4	Policy EJ5	Policy EJ6
SA13: Water	0	0	0	0	0	0
SA14: Resources	0	++	0	0	0	0

Policy EJ1: Economic growth in the transformational sectors

6.176 Policy EJ1: Economic growth in the transformational sectors 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, namely data analysis, environmental futures, health innovation, digital innovation, creative industries and other emerging transformational sectors. According to the policy, Exeter is committed to becoming one of the UK's leading knowledge economies.

6.177 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 through partnership working, in order to encourage and support growth in the transformational sectors.

6.178 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.179 One reasonable alternative to Policy EJ1: Economic growth 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 superseded by the inclusion of Policy EJ6.

Policy EJ2: Retention of employment land

6.180 Policy EJ2: Retention of employment land 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 currently not viable or needed. This represents an efficient use of previously developed land.

6.181 A minor 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. 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.

6.182 Negligible effects are expected against the remaining objectives.

Reasonable Alternatives

6.183 Two reasonable alternatives have been considered to Policy EJ2: Retention of employment land:

- 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.

6.184 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.

6.185 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

6.186 Policy EJ3: New forms of employment provision 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.

6.187 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. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.188 Two reasonable alternatives have been considered to Policy EJ3: New forms of employment provision:

- 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.

6.189 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.

6.190 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

6.191 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.

6.192 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

6.193 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.

6.194 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.

6.195 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

6.196 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 provision is limited to service the local workforce only.

6.197 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.

6.198 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

6.199 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.

6.200 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.

6.201 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

6.202 Policy EJ6: New transformational employment allocations 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.

6.203 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.204 One reasonable alternative has been considered to Policy EJ6: New transformational employment allocations:

- 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.

6.205 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.

The Future of High Streets

6.206 This section presents the appraisals of the following Exeter Plan policy:

- Policy HS1: The vitality of our high streets and centres

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

Table 6.6: Summary of SA findings for The Future of our High Streets Policy

SA Objectives	Policy HS1
SA1: Climate Change	0
SA2: Housing	0
SA3: Economic Growth	++
SA4: Health	+
SA5: Design and Built Environment	+
SA6: Community	+
SA7: Services, Facilities and Education	++
SA8: Sustainable Travel	+
SA9: Pollution	+
SA10: Biodiversity and Geodiversity	0
SA11: Landscape	+
SA12: Cultural Heritage	+
SA13: Water	0
SA14: Resources	+

Policy HS1: The vitality of our high streets and centres

6.208 Policy HS1: The vitality of our high streets and centres is expected to have significant positive effects in relation to SA Objective 3: Economic Growth and SA Objective 7: Services, Facilities and Education because the policy

seeks to protect, maintain and enhance the vitality, viability and resilience of the city centre, which will have beneficial effects on the economy, in addition to diversifying the offer of the city centre whilst also preventing large-scale retail development outside of the centres. The policy also supports retail provision including the temporary installation for stalls, markets and outdoor dining. This will ensure that people are within close proximity to numerous services and facilities, which will also reduce the need to travel elsewhere by private car to reach certain amenities. Therefore, a minor positive effect is expected in relation to SA Objective 8: Sustainable Travel. A minor positive effect is also expected in relation to SA Objective 9: Pollution because reducing reliance on the private car will help minimise emissions associated with use of the car, as well as noise. Further to this, ensuring all amenities are within close proximity to each other will encourage walking and cycling, with beneficial effects on people's health and wellbeing. For this reason, a minor positive effect is also expected in relation to SA Objective 4: Health.

6.209 Minor positive effects are expected against SA Objective 5: Design and the Built Environment and SA Objective 6: Community because the policy promotes attractive public spaces, which have the potential to encourage interaction between different groups of people, in addition to delivering cohesive neighbourhoods with high levels of pedestrian activity. Minor positive effects are also expected against SA Objective 11: Landscape and SA Objective 12: Cultural Heritage because the 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 for both residents and visitors to the city. The policy will also protect and enhance the cultural, historic and nature environment of centres.

6.210 Lastly, a minor positive effect is expected against SA Objective 14: Resources because this policy promotes the use of strategic brownfield development within the city centre and district and local centres, limiting development outside of these built-up areas and on high quality agricultural land. Proposals located out of the city centre, district centres and local centres and proposals for strategic brownfield development for town centre uses of more than 500 square metres will not be permitted unless the sequential test is

meet and the proposal won't have a negative impact on the city, district, or local centre's vitality and viability.

6.211 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.212 Two reasonable alternatives to Policy HS1: The role of our high streets have been considered. They are:

- Reasonable Alternative 1: City centre only policy – This option would set out a specific approach to managing development in the city centre but not for the district and local centres. This would not sufficiently support the role of the district and local centres.
- Reasonable Alternative 2: Prescriptive approach to appropriate uses in the centres – This option would be much more prescriptive about the potentially appropriate uses in the centres, focusing much more on traditional uses, particularly retail. This could undermine future resilience and vitality of the town centre.

6.213 Reasonable Alternative 1 is expected to have significant positive effects against SA Objectives 1: Climate Change and SA Objective 7: Services, Facilities and Education because although it would maintain and enhance the vitality, viability and resilience of the city centre only and would not support the role of district and local centres, it would still support economic growth with the City Council area – albeit to a lesser extent. The option does not specify the different ways in which development would be managed within the city centre but it is assumed these measures would be comparable to that identified for Policy HS1. Therefore, minor positive effects (albeit to a lesser extent) are also expected in relation to SA Objective 2: Housing, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 6: Community, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution, SA Objective 12: Cultural Heritage and SA Objective 14: Water Resources. Negligible effects are expected against the remaining SA objectives.

6.214 Reasonable Alternative 2 supports the more typical retail uses within the city centre and district and local centres, instead of a mixture of uses, namely commercial, entertainment, leisure, cultural, hospitality, educational, health, employment and residential uses. This has the potential to undermine the vitality, viability and resilience of the centres, which is particularly concerning following the shift to online shopping, which was accelerated by the COVID-19 pandemic. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA Objective 3: Economic Growth. A mixed minor positive and minor negative effect is also expected in relation to SA Objective 7: Services, Facilities and Education because if mainly retail uses are present within the centres, people may not be able to access other amenities and instead travel elsewhere to reach them. This limits the extent to which people can walk or cycle to reach certain services and facilities, with adverse effects on their health and wellbeing. However, it is noted that if there are a number of different types of shops in an area, then residents can at least pick up more necessary items. Therefore, mixed minor positive and minor negative effects are expected in relation to SA Objectives 4: Health and SA Objective 8: Sustainable Travel.

6.215 A minor negative effect is expected in relation to SA Objective 9: Pollution because this option has the potential to increase reliance on the private car, which can contribute to pollution and poor air quality. A minor negative effect is also expected in relation to SA Objective 2: Housing because under this option, housing development within the centres would not be supported.

6.216 A minor positive effect is expected against SA Objective 14: Resources because although this option supports retail development only, the option is still likely to promote the use of previously developed land within the city centre and town and district centres. Negligible effects are expected in relation to the remaining SA objectives.

Sustainable Transport and Communications

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

- Policy STC1: Sustainable movement
- Policy STC2: Active and sustainable travel in new developments
- Policy STC3: Supporting active travel
- Policy STC4: Supporting public transport
- Policy STC5: Supporting new forms of car use
- Policy STC6: Travel plans
- Policy STC7: Safeguarding transport infrastructure
- Policy STC8: Motorway service area

6.218 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	0	0	0	0	++	++	++	-	++
SA2: Housing	0	0	0	0	0	0	0	0	0
SA3: Economic Growth	+	+	+	0	0	-	0	++	0
SA4: Health	+	+	+	0	++	++	++	+/-	0
SA5: Design and Built Environment	0	0	+	+	0	0	0	0	0
SA6: Community	+	+	+	0	+	0	+	0	0
SA7: Services, Facilities and Education	+	0	0	0	+	+	+	-	0
SA8: Sustainable Travel	++	++	++	++	++	++	++	+/-	+
SA9: Pollution	+	+	+	+	++	++	++	+/-	+
SA10: Biodiversity and Geodiversity	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

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SA Objectives	Policy STC1	Policy STC2	Policy STC3	Policy STC4	Policy STC5	Policy STC6	Policy STC7	Policy STC8	Policy STC9
SA13: Water	0	0	0	0	0	0	+	0	0
SA14: Resources	0	0	0	0	0	0	0	0	0

Policy STC1: Sustainable movement

6.219 Policy STC1: Sustainable movement 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 maximises walking, cycling and the use of public transport for the majority of everyday journeys. 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 from their home. 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 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.

6.220 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.

6.221 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.222 One reasonable alternative has been considered to Policy STC1: Sustainable movement:

- 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.

6.223 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 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: Active and sustainable travel in new developments

6.224 Policy STC2: Active and sustainable travel in new developments 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. Highway enhancements are supported, but only where they are necessary. 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.

6.225 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.

6.226 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.227 One reasonable alternative has been considered to Policy STC2: Active and sustainable travel in new developments:

- 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.

6.228 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 a mixed minor positive and minor negative effect is expected in relation to 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

6.229 Policy STC3: Supporting active travel 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 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.

6.230 Minor positive effects are also expected in relation to SA Objective 4: Health and SA Objective 6: Community because of the requirement for new dwellings 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. 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 and street planting.

6.231 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.232 One reasonable alternative has been considered to Policy STC3: Active travel proposals:

- 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).

6.233 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 is expected in relation to SA Objective 8: Sustainable Travel, 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

6.234 Policy STC4: Supporting public transport 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.

6.235 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.

6.236 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.237 One reasonable alternative has been considered to Policy STC4: Public transport proposals:

- 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).

6.238 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. This could result in withdrawn support from Devon County Council who have had significant input into the wording of 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 is expected in relation to SA Objective 8: Sustainable Travel and a minor positive but uncertain effect is expected in relation to SA Objective 9: Pollution. Negligible effects are expected against the remaining SA objectives.

Policy STC5: Supporting new forms of car use

6.239 Policy STC5: Supporting new 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.

6.240 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.

6.241 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.242 Two reasonable alternatives have been considered to Policy STC5: Supporting new forms of car use:

- Reasonable Alternative 1: Less support for new 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.

6.243 Reasonable Alternative 1 would provide less support for new 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.

6.244 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

6.245 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.

6.246 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.

6.247 An uncertain minor positive effect is identified in relation to SA Objective 3: Economic Growth as minimising car travel may inhibit access to the City Centre and employment areas. However, the policy outlines that Travel Plans will consider the location of nearby facilities and services, infrastructure and facilities to support sustainable transport, multi-modal parking, travel information

and incentives for using sustainable transport, all of which, if considered in relation to economic growth, would enhance access and have positive effects on the economy.

6.248 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

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

Policy STC7: Safeguarding transport infrastructure

6.250 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. 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.

6.251 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.

6.252 A minor positive effect is identified for this policy in relation to SA Objective 13: Water as the policy requires the safeguarding of the disused railway line at Marsh Barton for flood risk adaptation. This would therefore aid in the mitigation of flood risk and increased flood resilience in the area.

6.253 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.

6.254 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.255 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.

6.256 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. The disused railway line at Marsh Barton will not be safeguarded for flood risk adaptation under Reasonable Alternative 1 leading to a minor negative effect against SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

Policy STC8: Motorway service area

6.257 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.

6.258 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.

6.259 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.

6.260 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.

6.261 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.262 No reasonable alternatives have been considered to Policy STC8: Motorway service area.

Policy STC9: Digital communications

6.263 Policy STC9: Digital communications 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 large scale residential, employment and commercial 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). Sites of at least 500 dwellings (or five hectares of employment land) will always provide at least two separate external connections to ensure coverage standards.

6.264 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.

6.265 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.266 No reasonable alternatives have been considered to Policy STC9: Digital communications.

Natural Environment

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

- Policy NE1: Landscape setting areas
- Policy NE2: Valley Parks
- Policy NE3: Biodiversity
- Policy NE4: Green infrastructure
- Policy NE5: The Green Circle
- Policy NE6: Urban greening factor
- Policy NE7: Urban tree canopy cover

6.268 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	0	0	0	0	0	+
SA2: Housing	-?	-?	-?	0	0	0	0
SA3: Economic Growth	0	0	0	0	0	0	0
SA4: Health	0	+	+	+	++	+	+
SA5: Design and Built Environment	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
SA9: Pollution	0	+	0	+	0	+	+
SA10: Biodiversity and Geodiversity	0	+	++	++	0	++	+?
SA11: Landscape	++	0	0	+	0	+	+
SA12: Cultural Heritage	0	0	0	0	0	0	0

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SA Objectives	Policy NE1	Policy NE2	Policy NE3	Policy NE4	Policy NE5	Policy NE6	Policy NE7
SA13: Water	0	+	0	0	0	0	+
SA14: Resources	0	0	0	0	0	0	0

Policy NE1: Landscape setting areas

6.269 Policy NE1: Landscape setting areas is expected to have a significant positive effect in relation to SA Objective 11: Landscape because it seeks to protect 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. Only in exceptional circumstances will this be overruled, where no suitable alternatives can be found, and the importance of the strategic infrastructure outweighs that of the Landscape Setting Area.

6.270 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.

6.271 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.272 One reasonable alternative has been considered to Policy NE1: Landscape setting areas:

- 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.

6.273 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

6.274 Policy NE2: Valley Parks 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.

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

6.276 A minor 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. A minor positive effect is also expected against SA Objective 13: Water because support is given to managing flood risk.

6.277 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.

6.278 Negligible effects are expected against the remaining SA objective.

Reasonable Alternatives

6.279 Three reasonable alternatives have been considered to Policy NE2: Valley Parks:

- 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.

6.280 Reasonable Alternative 1 would not prevent development that would harm the Valley Parks. Although the type of harm is not specified within this option, it is assumed that it refers to 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.

6.281 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.

6.282 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.

6.283 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

6.284 Policy NE3: Biodiversity 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, 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.

6.285 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.

6.286 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.

6.287 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.288 One reasonable alternative to Policy NE3: Biodiversity 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.

6.289 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

6.290 A significant positive effect is expected for Policy NE4: Green infrastructure 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.

6.291 Green infrastructure networks often comprise walking and cycling routes and according to the policy, all large-scale residential 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. Therefore, minor positive effects are expected against SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution.

6.292 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.

6.293 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.294 Three reasonable alternatives have been considered to Policy NE4: Green infrastructure:

- 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.

6.295 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.

6.296 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.

6.297 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.

6.298 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: The Green Circle

6.299 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.

6.300 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

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

Policy NE6: Urban greening factor

6.302 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.

6.303 Green infrastructure often comprises of walking and cycling routes. This will encourage the use of active travel and reduce pollution associated with use of the private car, whilst also having beneficial effects on people's health and wellbeing. Therefore, minor positive effects are expected against SA Objective 4: Health, SA Objective 8: Sustainable Travel and SA Objective 9: Pollution.

6.304 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. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.305 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.

6.306 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, a minor positive effect is expected in relation to SA Objective 4: Health, SA Objective 8: Sustainable Travel, SA

Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity and SA Objective 11: Landscape. Negligible effects are expected against the remaining SA objectives.

Policy NE7: Urban tree canopy cover

6.307 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.

6.308 A minor positive effect is expected against SA Objective 5: Design and the Built Environment as ensuring that all new streets are tree-lined will enhance the design and visual amenity of a development proposal. It will also have a positive impact on the local townscape by incorporating street trees and increasing tree canopy cover within a development proposal. 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.

6.309 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

6.310 One reasonable alternative has been considered to Policy NE7: Urban tree canopy cover:

- Reasonable Alternative 1: Different uplift target – The 5.5% is based on the difference between the current coverage (24.5%) and our overall target (30%). There is a lack of evidence to justify an alternative target.

6.311 Reasonable Alternative 1 proposes a different uplift target. A different uplift target is not likely to be significant enough to change the effects from those identified for Policy NE7. However, this is to some extent uncertain without knowing what the different uplift target would be. Therefore, minor positive effects are identified against SA Objective 9: Pollution, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 11: Landscape, SA Objective 10: Biodiversity and Geodiversity and SA Objective 13: Water. These minor positive effects are uncertain. Negligible effects are expected against the remaining SA objectives.

History and Heritage

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

- Policy HH1: Conserving and enhancing Exeter's historic environment
- Policy HH2: Heritage assets and climate change
- Policy HH3: Conserving and enhancing Exeter City Walls

6.313 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 Policies

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

Policy HH1: Conserving and enhancing Exeter's historic environment

6.314 Policy HH1: Conserving and enhancing Exeter's historic environment 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.

6.315 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.

6.316 A minor positive effect is expected against SA Objective 11: Landscape as protection and enhancement of the city's sensitive historic townscape and unique built form, and the setting of heritage assets, is central to the policy.

6.317 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.318 One reasonable alternative has been considered to Policy HH1: Conserving and enhancing heritage assets:

- 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.

6.319 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, SA Objective 5: Design and the Built Environment and SA Objective 11: Landscape. Negligible effects are expected against the remaining SA objectives.

Policy HH2: Heritage assets and climate change

6.320 Policy HH2: Heritage assets and climate change is generally supportive of development that makes a contribution to addressing climate change assuming that the contribution outweighs any impact on a heritage asset. Therefore, minor positive effects are expected against SA Objective 1: Climate Change. Minor positive effects are 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.

6.321 Minor positive effects are expected in relation to SA Objective 11: Landscape as the policy aims to protect the setting of historic assets from harm. This could positively impact streets and areas within Exeter. Significant positive effect are expected against SA Objective 12: Cultural Heritage as Policy HH2 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.

6.322 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.323 One reasonable alternative has been considered to Policy HH2: 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.

6.324 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 HH3: Conserving and enhancing Exeter City Walls

6.325 Policy HH3: 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 of the City Walls. Therefore, a significant positive effect is expected against SA Objective 12: Cultural Heritage. Minor positive effects are expected in relation to SA Objective 11: Landscape as the policy will ensure the setting of the Exeter City Walls are not negatively impacted. Also development proposals will be required to improve the visibility of the City Walls.

6.326 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

6.327 No reasonable alternatives have been considered to Policy HH3: Conserving and enhancing Exeter City Walls.

Culture and Tourism

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

- Policy C1: Protecting and enhancing cultural and tourism facilities
- Policy C2: Development and cultural provision

6.329 The likely effects of the policy in relation to each SA objective are shown in Table 6.10 and 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 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

6.330 Policy C1: Protecting and enhancing cultural and tourism facilities 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.

6.331 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 is not harm to public amenity. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.332 No reasonable alternatives have been considered to Policy C1: Protecting and enhancing cultural and tourism facilities.

Policy C2: Development and cultural provision

6.333 Policy C2: Development and cultural provision will help enhance local culture with developers required to engage with local communities to ensure any local cultural provision reflects local identity. 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 because it seeks to contribute to local cultural provision in proportion to the scale of development. 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

6.334 No reasonable alternatives have been considered to Policy C2: Development and cultural provision.

High Quality Places and Design

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

- Policy D1: Design principles
- Policy D2: Advertisements

6.336 The likely effects of the policies in relation to each SA objective are shown in Table 6.11 and 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
SA1: Climate Change	+	+?
SA2: Housing	0	0
SA3: Economic Growth	+	0
SA4: Health	+	0
SA5: Design and Built Environment	++	+
SA6: Community	+	+
SA7: Services, Facilities and Education	0	0
SA8: Sustainable Travel	+	0
SA9: Pollution	+	+
SA10: Biodiversity and Geodiversity	+	0
SA11: Landscape	+	+
SA12: Cultural Heritage	+	+
SA13: Water	0	0
SA14: Resources	0	0

Policy D1: Design principles

6.337 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 deliver visually attractive development and distinctive places, in addition to a high quality public realm that incorporates public art.

6.338 Policy D1: Design principles 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 support the city's net zero ambitions and adapt to the impacts of climate change. 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.

6.339 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.

6.340 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. Additionally, a high quality environment can improve residents' health and wellbeing.

6.341 The policy also outlines that retention, refurbishment and enhancement of existing buildings of high townscape 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. Therefore, minor positive effects are expected against SA Objective 11: Landscape and SA Objective 12: Cultural Heritage.

6.342 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 are retained and protected. The policy also supports the planting of native trees.

6.343 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.344 Two reasonable alternatives have been considered to Policy D1: Design Principles. 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.

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

6.346 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 and SA Objective 12: Cultural Heritage. 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: Advertisements

6.347 Policy D2: 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.

6.348 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.

6.349 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.

6.350 Policy D2 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

6.351 No reasonable alternatives have been considered in relation to Policy D2: Advertisements.

Health and Wellbeing

6.352 This section presents the appraisal of the following Exeter Plan policies:

- Policy HW1: Health and wellbeing
- Policy HW2: Pollution and contaminated land

6.353 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	+

SA Objectives	Policy HW1	Policy HW2
SA2: Housing	0	0
SA3: Economic Growth	0	0
SA4: Health	++	+
SA5: Design and Built Environment	0	0
SA6: Community	++	0
SA7: Services, Facilities and Education	+	0
SA8: Sustainable Travel	+	0
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

6.354 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, and safety and wellbeing. Therefore, a significant positive effect is also expected in relation to SA Objective 6: Community.

6.355 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.

6.356 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.357 One reasonable alternative has been considered in relation to Policy HW1: Health and wellbeing:

- 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.

6.358 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: Pollution and contaminated land

6.359 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 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 pollution levels including air, noise and light. This could have a positive impact on human health by preventing rises in air and noise pollution.

6.360 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, pollution or poor standards of amenity where certain criteria are met. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.361 No reasonable alternatives have been considered in relation to Policy HW2: Pollution and contaminated land.

Infrastructure and Community Facilities

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

- Policy IC1: Delivery of infrastructure

- Policy IC2: Viability
- Policy IC3: Community facilities
- Policy IC4: Sport, recreation and allotment space in new development
- Policy IC5: Play areas in new development
- Policy IC6: New cemetery provision

6.363 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 Community Facilities Policies

SA Objectives	Policy IC1	Policy IC2	Policy IC3	Policy IC4	Policy IC5	Policy IC6
SA1: Climate Change	+	+/-?	0	0	0	0
SA2: Housing	0	+/-?	0	0	0	0
SA3: Economic Growth	+	+/-?	0	0	0	0
SA4: Health	+	+/-?	++?	++	++	+
SA5: Design and Built Environment	+	+/-?	0	+	0	0
SA6: Community	+	+/-?	++?	++	++	0
SA7: Services, Facilities and Education	+	+/-?	++?	0	0	0
SA8: Sustainable Travel	+	+/-?	+	+	0	0
SA9: Pollution	+	+/-?	+	0	0	+
SA10: Biodiversity and Geodiversity	0	+/-?	0	0	0	+
SA11: Landscape	0	+/-?	0	+	0	+
SA12: Cultural Heritage	0	+/-?	0	0	0	0

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SA Objectives	Policy IC1	Policy IC2	Policy IC3	Policy IC4	Policy IC5	Policy IC6
SA13: Water	+	+/-?	0	0	0	+
SA14: Resources	0	+/-?	0	0	0	0

Policy IC1: Delivery of infrastructure

6.364 Policy IC1: Delivery of infrastructure is expected to have a minor positive effect in relation to SA Objective 5: Design and the Built Environment because through contributions, it seeks to ensure that the necessary infrastructure is in place to support high quality development. 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.

6.365 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; 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.

6.366 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.367 Two reasonable alternatives have been considered to Policy IC1: Delivery of infrastructure:

- 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.

6.368 Unlike Policy IC1, 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 IC1, 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.

6.369 Reasonable Alternative 2 would outline specific infrastructure requirements and therefore provide more certainty than Policy IC1. 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 IC2: Viability

6.370 Policy IC2: Viability 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.

6.371 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

6.372 No reasonable alternatives have been considered in relation to Policy IC3: Viability.

Policy IC3: Community facilities

6.373 Policy IC3: Community facilities 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 services and facilities and supports the delivery of new or improves services and facilities, which meet community, social, health, welfare, education, spiritual, cultural, leisure and recreation needs.

6.374 Minor positive effects are expected in relation to SA Objective 8: Sustainable Travel because the policy requires services and facilities to be either located within the city centre or at sustainable locations easily accessible by walking, cycling and public transport. 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.

6.375 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.376 One reasonable alternative has been considered in relation to Policy IC3: Community facilities:

- 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.

6.377 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 IC4: Sport, recreation and allotment space in new development

6.378 Policy IC4: Sport, recreation and allotment space in new development requires residential development to provide open space whether on-site or a contribution to off-site provision. This will increase access to open space for recreation supporting healthier lifestyles. Therefore, a significant positive effect is expected against SA Objective 4: Health. The policy supports open space that is safe and secure design with appropriate landscaping. Open space is also required to 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.

6.379 A minor positive effect is expected against SA Objective 8: Sustainable Travel as new open space is required to be integrated into the wider pedestrian and cycle network which could encourage the use of sustainable modes of transport such as walking and cycling. The open space as part of a residential development is required to provide appropriate landscaping resulting in a minor positive effect for SA Objective 11: Landscape. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.380 One reasonable alternative has been considered to Policy IC4: Sport, recreation and allotment space in new development:

- Reasonable Alternative 1: Alternative open space requirements – The adopted requirements are based on the Fields in Trust guidance, which is nationally accepted as being the benchmark standards. There is a lack of evidence to adopt alternative standards.

6.381 Reasonable Alternative 1 would support the provision of sport, recreation and allotment provision in new development. However, not abiding by the adopted requirements based on the Fields in trust guidance could result in an under supply of play areas. Therefore, a minor rather than significant positive effect is identified in relation to SA Objective 4: Health and SA Objective 6: Community. Negligible effects are expected against the remaining SA objectives.

Policy IC5: Play areas in new development

6.382 Policy IC5: Play areas in new development requires major residential developments to make provision in accordance with the Council Play Strategy either through financial contribution or new provision. This will result in significant positive effects for SA Objective 4: Health and SA Objective 6: Community as this policy will ensure there is adequate provision of play areas. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.383 One reasonable alternative has been considered to Policy IC5: Play areas in new development:

- Reasonable Alternative 1: Alternative open space requirements – The adopted requirements are based on the Fields in Trust guidance, which is nationally accepted as being the benchmark standards. There is a lack of evidence to adopt alternative standards.

6.384 Reasonable Alternative 1 would support the provision of play areas in new development. However, not abiding by the adopted requirements based on the Fields in trust guidance could result in an under supply of play areas. Therefore, a minor positive effect is identified in relation to SA Objective 4: Health and SA Objective 6: Community. Negligible effects are expected against the remaining SA objectives.

Policy IC6: New cemetery provision

6.385 Policy IC6: New cemetery provision supports additional 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.

6.386 Policy IC6: New cemetery provision requires proposals for cemetery provision to be located outside of areas of high flood risk, Groundwater Protection Zones and contaminated land. It also requires proposals not to have an unacceptable impact on landscape sensitivity or biodiversity. Therefore, minor positive effects are expected against SA Objective 10: Biodiversity and Geodiversity, SA Objective 9: Pollution, SA Objective 11: Landscape and SA Objective 13: Water. Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.387 No reasonable alternatives have been considered to Policy IC6: New cemetery provision.

Site Allocation Policies

6.388 This section presents the appraisals of the following site allocation policies:

- Marsh Barton – Reference 14 (Strategic policy)
- Water Lane – Reference 15 (Strategic policy)
- East Gate – Reference 52 (Strategic policy)
- Red Cow – Reference 22 (Strategic policy)
- North Gate – Reference 42 (Strategic policy)
- South Gate – Reference 46 (Strategic policy)

6.389 The likely effects of the policies in relation to each SA objective are shown in Table 6.14 and described below the table.

6.390 The sites allocated in these policies were originally appraised as site options in Chapter 5. The ‘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. The following site options relate to each policy:

- Marsh Barton – Reference 14 (Strategic policy) – Site ID: 14 (Marsh Barton)
- Water Lane – Reference 15 (Strategic policy) – Site ID: 15 (Water Lane)
- East Gate – Reference 52 (Strategic policy) – Site ID: 52 (East Gate)

- Red Cow – Reference 22 (Strategic policy) – Site ID: 22 (Red Cow/St Davids)
- North Gate – Reference 42 (Strategic policy) – Site ID: 42 (North Gate)
- South Gate – Reference 46 (Strategic policy) – Site ID: 46 (South Gate)

Table 6.14: Summary of SA findings for Site Allocation Policies

SA Objectives	Marsh Barton	Water Lane	East Gate	Red Cow	North Gate	South Gate
SA1: Climate Change	++	++	++	++	++	++
SA2: Housing	++	++	++	++	++	++
SA3: Economic Growth	++/-?	+	--?/+	++	++	++
SA4: Health	++	++/-	++	++	++	++/-
SA5: Design and Built Environment	++	++	++	++	++	++
SA6: Community	++	++	++	++	++	++
SA7: Services, Facilities and Education	++	++	++	++	++	++
SA8: Sustainable Travel	++	++	++	++	++	++
SA9: Pollution	--/+	+/-	--/+	--/+	--/+	--/+
SA10: Biodiversity and Geodiversity	+	--/+	+/-	--/+	--/+	+/-
SA11: Landscape	+	--/+	0	0	0	0
SA12: Cultural Heritage	0	--/+	+/-	+/-	++/--	++/--

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SA Objectives	Marsh Barton	Water Lane	East Gate	Red Cow	North Gate	South Gate
SA13: Water	--/+	--/+	--/+	--/+	--/+	--/+
SA14: Resources	++	++	++	++	++	++

6.391 The policies 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.

6.392 Significant positive effects are identified for all six Site Allocation Policies in relation to SA Objective 1: Climate Change. Each policy 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.

6.393 Significant positive effects are also identified for all six Site Allocation Policies for SA Objective 2: Housing. All 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. The Policy for Marsh Barton requires a 70 unit extra care housing scheme. At South Gate, appropriate homeless accommodation 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.

6.394 A significant positive effect is also identified for all six Site Allocation Policies for SA Objective 5: Design and the Built Environment. All six 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 'Water Lane Design Code Supplementary Planning Document'.

6.395 Significant positive effects are also identified for all six Site Allocation Policies with regard to SA Objective 8: Sustainable Travel. Each site is located in close proximity of Exeter city centre and is well served by existing public

transport connections. Additionally, each of the 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.

6.396 Significant positive effects are identified for all six Site Allocation Policies against SA Objective 14: Resources Each site represents the re-development of brownfield land. Each Site Allocation Policy requires an energy strategy that minimises carbon emissions (both operational and embodied) and measures to support the continued operation of waste operations and cement works (on site or replacement facilities elsewhere). The scale of demolition and new development to be delivered at each site is likely to result in considerable use of resources. However, the Policy for Marsh Barton and Water Lane require measures to support the continued operation of the waste operations close to the site.

Marsh Barton – Reference 14 (Strategic policy)

6.397 An overall mixed effect (uncertain minor negative/significant 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 requires the re-provision of existing levels of employment space at higher densities including work hubs, collaborative workspaces, live-work schemes and start-up units.

6.398 A significant positive effect is identified for SA Objective 4: Health. The Policy requires the provision of a locally accessible neighbourhood centre which includes a new surgery providing GP, pharmacy and other community healthcare provision. The policy also requires the enhancement of green infrastructure and the natural environment including a mix of open space provision, onsite allotments, and other biodiversity enhancements.

6.399 Significant positive effects are identified for SA Objective 6: Community Cohesion and SA Objective 7: Services, Facilities and Education as the Policy

requires accordance with Liveable Exeter Principles and will deliver a locally accessible neighbourhood centre with a range of local services and facilities, ensuring opportunities for pedestrian activity/outdoor interaction between residents, and sets out the requirement for housing to meet diverse needs which will help meet the needs of residents with protected characteristics (e.g. elderly and disabled people).

6.400 A small part of the AQMA along Marsh Barton 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. Overall, the scale of development proposed through this site allocation 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.

6.401 The Policy requires green infrastructure provision including off-site provision and biodiversity enhancements along with green infrastructure improvements to Alphin Brook and linking to the Exeter Ship Canal and Riverside Valley Park. The policy will also ensure no adverse effect on Exe Estuary SPA with mitigation contributions required in line with the South-east Devon Mitigation Strategy. Therefore, a minor positive effect is expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.402 The site allocation is not allocated within an area assessed as having medium or high landscape sensitivity. The policy requires high quality green infrastructure improvements to the Alphin Brook and the linking to the Exeter Ship Canal and Riverside Valley Park. Therefore, a minor positive effect is expected in relation to SA Objective 11: Landscape.

6.403 A negligible effect is identified for SA Objective 12: Cultural Heritage as the site does not contain any designated heritage assets and Policy A1 requires a built form that protects the settings of all nearby listed buildings.

6.404 An overall mixed effect (significant negative and minor negative) is identified for the Policy in relation to SA Objective 13: Water. The whole site is located within Flood Zone 2 or 3. However, the site has been previously developed as light industrial land and flood defences are in place. The Policy requires appropriate flood mitigation including a layout informed by detailed FRA, incorporation of SuDS and delivery of/contributions to an emergency access and egress route over the Great Western Mainline. 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.

Water Lane – Reference 15 (Strategic policy)

6.405 For the 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.

6.406 An overall mixed effect (significant positive/minor negative) 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 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.

6.407 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 provides space for community and cultural activities, health facilities, retail and commercial units, employment space, primary education and space for water-related activities. 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.

6.408 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. 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.

6.409 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. The policy will also ensure no adverse effect on European sites with mitigation contributions required in line with the South-east Devon Mitigation Strategy. Therefore, a mixed effect (significant negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.410 The site allocation falls within an area considered to have high or medium to high landscape sensitivity. The policy does support the creation of high quality green infrastructure linking to the Exeter Ship Canal and Riverside Valley Park. Therefore, a mixed effect (significant negative and minor positive) is expected in relation to SA Objective 11: Landscape.

6.411 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 (minor negative and minor positive) are expected in relation to SA Objective 12: Cultural Heritage.

6.412 The site allocation is located entirely within Flood Zone 2 or Flood Zone 3 on the edge of the River Exe. However, the site has been previously developed and flood defences are in place. The Policy requires appropriate flood mitigation including a layout informed by detailed FRA, incorporation of SuDS and delivery of/contributions to an emergency access and egress route over the Great Western Mainline. 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.

East Gate – Reference 52 (Strategic policy)

6.413 For the 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 employment to meet the needs of the transformational sectors which includes work hubs, collaborative workspace and live-work schemes.

6.414 A significant positive effect is expected in relation to SA Objective 4: Health. 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 innovation and literary hub to support the development. Green infrastructure provision is also required in accordance with the Green Infrastructure Strategy.

6.415 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; innovation and literary hub; 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.

6.416 Part of the AQMA along Bonhay Road falls within the southern portion of the site allocation. In addition, the AQMA that runs along Cowley Bridge Road runs along the eastern edge of the site. 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 A4 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.

6.417 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 Mitigation Strategy. Therefore, a mixed effect (minor negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.418 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.

6.419 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 Southernlernhay and The Friars and the Lower Summerlands Conservation Areas and protection to the settings of all listed buildings including Sidwell Street Methodist Church (Grade II* listed), 13-15 Dix's Field (Grade II*) and those along Heavitree Road and Dix's Field. Therefore, mixed effects (minor negative and minor positive) are identified against SA Objective 12: Cultural Heritage.

6.420 The site allocation is located within a 1 in 30 year risk of surface water flooding. The Policy requires appropriate flood mitigation including a layout informed by detailed FRA 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, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 13: Water.

Red Cow – Reference 22 (Strategic policy)

6.421 For the Policy, 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.

6.422 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.

6.423 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.

6.424 Part of the AQMA along Paris Street and Heavitree 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.

6.425 Development of the site allocation through Policy A4 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 Mitigation Strategy. Therefore, a mixed effect (significant negative and minor positive) is expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.426 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.

6.427 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 A4 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 (minor negative and minor positive) are expected in relation to SA Objective 12: Cultural Heritage.

6.428 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 A2 requires appropriate flood mitigation including a layout 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.

North Gate – Reference 42 (Strategic policy)

6.429 For the Policy, 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.

6.430 A significant positive effect is identified for SA Objective 4: Health as the Policy requires contributions to GP provision and also lies within 700m of a number of healthcare facilities. The Policy also requires the enhancement of green infrastructure including off-site contributions, public realm improvements and biodiversity enhancements.

6.431 According to the IMD, the site allocation falls within the 30-40% 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 the retention and improvement of Guildhall Shopping Centre. 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.

6.432 The AQMA along North Street runs through the centre 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. 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.

6.433 Development of the site allocation through the Policy will result in the loss of green infrastructure. The site allocation is located approximately 246m 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 Mitigation Strategy. Therefore, mixed effects (significant negative and minor positive) are expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.434 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.

6.435 The site allocation falls within the City Centre 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, Policy A5 requires the enhancement of the City Walls and all listed buildings including St Mary Arches Church (Grade 1 listed), Church of St Pancras (Grade II* listed), the Synagogue (Grade II* listed), Civic Hall Higher Market (Grade II* listed) and Gaumont Palace/Mecca Bingo Club (Grade II listed) and those along North Street, High Street, Mary Arches Street and other 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.

6.436 An overall mixed effect (significant negative and minor positive) is identified for the Policy in relation to SA Objective 13: Water. The whole site is located within a 1 in 30 year risk of surface water flooding. The Policy requires appropriate flood mitigation including a layout informed by detailed FRA 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.

South Gate – Reference 46 (Strategic policy)

6.437 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.

6.438 An overall mixed effect (significant positive/minor negative) 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. The policy also requires contributions to GP provision with two healthcare facilities located within 700m of the site allocation.

6.439 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 the retention of Guildhall shopping centre. 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.

6.440 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. 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.

6.441 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 Mitigation Strategy.

Therefore, mixed effects (minor negative and minor positive) are expected in relation to SA Objective 10: Biodiversity and Geodiversity.

6.442 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.

6.443 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 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.

6.444 An overall mixed effect (significant negative and minor positive) is identified for the Policy in relation to SA Objective 13: Water. The site is located within a 1 in 30 year risk of surface water flooding. The Policy requires appropriate flood mitigation including a layout informed by detailed FRA 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.

Cumulative Effects

6.445 This section presents an assessment of the likely cumulative, secondary and synergistic effects of the Full Draft Plan as a whole, against each of the 14 SA objectives.

6.446 Table 6.15 below presents a summary of the likely effects of the objectives and policies in the Full Draft Plan.

Table 6.15: Summary of SA findings for the Objectives, Policies and Site Allocations in the Full Draft Plan

SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Objective 1: Climate Emergency	++	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
Objective 3: Economy and Jobs	+	0	++	0	0	0	+	0	0	0	0	0	0	0
Objective 4: The Future of the High Streets	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
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
Objective 11: Infrastructure and Community Facilities	+	0	+	+	0	++	++	+?	+?	0	0	0	+?	0
Policy S1: Spatial Strategy	+/-?	++	++	+	+?	+	+	++	+/-?	-?	-?	-?	-?	+/-?
Policy S2: Liveable Exeter Principles	+?	+?	+?	++	++	++	+?	+?	+?	+/-?	+/-?	+/-?	+/-?	+/-?
Policy CC1: Net zero Exeter	++	0	+	+	+	0	+?	+	+	+	+	+	+	0
Policy CC2: Renewable and low carbon energy	++	0	+	+	+	+	0	0	+	+	+	+	0	0
Policy CC3: Local energy networks	++	0	+	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	0	++
Policy CC5: Future development standards	++	-	-	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: Solar-ready developments	+?	0	+?	0	0	0	0	0	+?	0	0	0	0	0
Policy CC8: Flood risk	+	0	0	+	0	0	0	0	0	0	0	0	++	0

SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy CC9: Water quantity and quality	+	-	0	0	0	0	0	0	+	++	0	0	++	++
Policy H1: Housing requirements	0	++	+	0	0	0	0	0	0	-?	-?	-?	-?	-?
Policy H2: Housing allocation and windfalls	0	++	--?/+	++/--?	0	+	+?/-?	++	--	--?	-?	--?	--	++/--
Policy H3: Affordable housing	0	++	0	0	+	+	0	0	0	0	0	0	0	+
Policy H4: Build to rent	0	++	0	0	++	+	0	0	0	0	0	0	0	0
Policy H5: Co-living housing	+	++	0	+	++	++	+	+	+	0	0	0	0	0
Policy H6: Custom and self-build housing	0	++	0	0	+	0	0	0	0	0	+	+	0	0
Policy H7: Specialist accommodation	+	++	0	++	+	++	++	+	+	0	0	0	0	0
Policy H8: Purpose built student accommodation	+	+	0	+	+	+	++	+	+	0	0	0	0	0
Policy H9: Gypsy and traveller accommodation	+	++	0	+	+	+	++	+	+	+/-	+/-	0	+	0
Policy H10: Residential conversions and houses in multiple occupation	0	+	0	+	+	+	0	+	0	0	+	+	0	0
Policy H11: Loss of residential accommodation	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy H12: Accessible homes	0	++	0	++	0	++	0	0	0	0	0	0	0	0
Policy H13: Housing density and size mix	0	+	0	0	0	+	0	0	0	0	+	+	0	+
Policy H14: Residential amenity and healthy homes	0	++	0	++	+	+	0	0	+	0	0	0	0	0
Policy EJ1: Economic growth in the transformational sectors	0	0	++	0	0	0	+	0	0	0	0	0	0	0
Policy EJ2: Retention of employment land	0	0	+	0	0	0	0	0	+	0	0	0	0	++
Policy EJ3: New forms of employment provision	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	0
Policy EJ5: Provision of local services in employment areas	0	0	+	+	0	0	+	+	0	0	0	0	0	0
Policy EJ6: New transformation employment allocations	0	0	++	0	0	0	0	0	0	0	0	0	0	0
Policy HS1: The vitality of our high streets and centres	0	0	++	+	+	+	++	+	+	0	+	+	0	+
Policy STC1: Sustainable movement	0	0	+	+	0	+	+	++	+	0	0	0	0	0

SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy STC2: Active and sustainable travel in new developments	0	0	+	+	0	+	0	++	+	0	0	0	0	0
Policy STC3: Supporting active travel	0	0	+	+	+	+	0	++	+	+	0	0	0	0
Policy STC4: Supporting public transport proposals	0	0	0	0	+	0	0	++	+	0	0	0	0	0
Policy STC5: Supporting new forms of car use	++	0	0	++	0	+	+	++	++	0	0	0	0	0
Policy STC6: Travel plans	++	0	+?	++	0	0	+	++	++	0	0	0	0	0
Policy STC7: Safeguarding transport infrastructure	++	0	0	++	0	+	+	++	++	+	0	0	-	0
Policy STC8: Motorway service area	-	0	++	+/-	0	0	-	+/-	+/-	0	0	0	0	0
Policy STC9: Digital communications	++	0	0	0	0	0	0	+	+	0	0	0	0	0
Policy NE1: Landscape setting areas	0	-?	0	0	0	0	0	0	0	0	++	0	0	0
Policy NE2: Valley Parks	0	-?	0	+	0	0	0	+	+	+	0	0	+	0
Policy NE3: Biodiversity	0	-?	0	+	0	0	0	0	0	++	0	0	0	0
Policy NE4: Green infrastructure	0	0	0	+	0	0	0	+	+	++	+	0	0	0
Policy NE5: The 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	0	0
Policy NE7: Urban tree canopy cover	+	0	0	+	+	0	0	0	+	+?	+	0	+	0
Policy HH1: Conserving and enhancing Exeter’s historic environment	+	0	0	0	+	0	0	0	0	0	+	++	0	0
Policy HH2: Heritage assets and climate change	+	0	0	0	+	0	0	0	0	0	+	++/-	0	0
Policy HH3: Conserving and enhancing Exeter’s City Walls	0	0	0	+	0	0	0	0	0	0	+	++	0	0
Policy C1: Protecting and enhancing cultural and tourism facilities	0	0	++	+	0	0	0	0	0	0	0	+	0	0
Policy C2: Development and cultural provision	0	0	0	0	0	+	0	0	0	0	0	+	0	0
Policy D1: Design principles	+	0	+	+	++	+	0	+	+	+	+	+	0	0
Policy D2: Advertisements	+?	0	0	0	+	+	0	0	+	0	+	+	0	0
Policy HW1: Health and wellbeing	0	0	0	++	0	++	+	+	+	0	0	0	0	0

SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy HW2: Pollution and contaminated land	+	0	0	+	0	0	0	0	++	0	0	0	0	+
Policy IC1: Delivery of infrastructure	+?	0	+	+?	+	+?	+?	+?	+?	0	0	0	+?	0
Policy IC2: Viability	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?
Policy IC3: Community facilities	0	0	0	++	0	++	++	+	+	0	0	0	0	0
Policy IC4: Sport, recreation and allotment space in new development	0	0	0	++	+	++	0	+	0	0	+	0	0	0
Policy IC5: Play areas in new development	0	0	0	++	0	++	0	0	0	0	0	0	0	0
Policy IC6: New cemetery provision	0	0	0	+	0	0	0	0	+	+	+	0	+	0
Marsh Barton – Reference 14 (Strategic policy)	++	++	++/-?	++	++	++	++	++	--/+	+	+	0	--/+	++
Water Lane – Reference 15 (Strategic policy)	++	++	+	++/-	++	++	++	++	+/-	--/+	--/+	--/+	--/+	++
East Gate – Reference 52 (Strategic policy)	++	++	--?/+	++	++	++	++	++	--/+	+/-	0	+/-	--/+	++
Red Cow – Reference 22 (Strategic policy)	++	++	+	++	++	++	++	++	--/+	--/+	0	+/-	--/+	++
North Gate – Reference 42 (Strategic policy)	++	++	+	++	++	++	++	++	--/+	--/+	0	++/--	--/+	++
South Gate – Reference 46 (Strategic policy)	++	++	+	++/-	++	++	++	++	--/+	+/-	0	++/--	--/+	++

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

6.447 The Full Draft 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 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 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, and there is a policy dedicated to mitigating flood risk and utilising SuDS (Policy CC8: Flood risk). The use of PV panels is supported through Policy CC4: Ground-mounted photovoltaic array and Policy CC7: Solar-ready development. Policy CC5: Future development standards requires development to achieve a reduction in carbon dioxide emissions in line with the 2013 Building Regulations.

6.448 All of the sites allocated in the Full Draft Plan via Policy H2: Housing allocations 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 will inevitably result in increased carbon emissions from buildings, commercial activities and road traffic, despite the strong mitigation built into the Plan.

6.449 Overall, the Full Draft 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

6.450 The Exeter Plan will deliver a total of 14,140 new homes over the Plan period, as detailed in Policy H1: Housing requirement, which incorporates a headroom of 10% and therefore provides greater flexibility in the event that delivery is not as expected. Policy H2: Housing allocations and windfalls allocates 26 sites with the capacity for 5,351 new homes, 20 of which are residential sites and six 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.

6.451 Overall, the Full Draft 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

6.452 The Full Draft 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 in the transformational sectors. The remaining policies in the 'Economy and Jobs' section of the Full Draft 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) and support for flexible working (Policy EJ3: New forms of employment provision), 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 allocates a total of 17ha of transformational employment land across four sites.

6.453 Policy HS1: The vitality of our high streets and centres in ‘The Future of our High Streets’ section of the Plan will also have very positive effects on SA Objective 3: Economic Growth, as diversifying the offer of the city centre along its high streets will have beneficial effects on the economy. Likewise, Policy C1: Protecting and enhancing cultural and tourism facilities 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; STC2: Active and sustainable travel in new developments; and STC3: Supporting active travel 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 supports the redevelopment of the motorway service area at Moor Lane, adjacent to Junction 30 on the M5, for employment uses.

6.454 Policy H2: Housing allocations and windfalls 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. One 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.

6.455 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.

6.456 Overall, the Full Draft 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

6.457 The Full Draft 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 and IC3: Community facilities 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 H14: 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 H7: Specialist accommodation and Policy H12: 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.

6.458 The sites allocated in Policy H2: Housing allocations and windfalls 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 IC1: Delivery of infrastructure is assumed to cover healthcare provision.

6.459 Overall, the Full Draft 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

6.460 The Full Draft 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 and Policy D1: Design principles in the 'High Quality Places and Design' section of the Plan explicitly address this objective, whilst Policy IC1: Delivery of infrastructure 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), an enhanced public realm that incorporates street planting (Policy STC2: Active travel proposals and Policy NE7: Urban tree canopy), attractive public spaces (Policy HS1: The vitality of our high streets and centres) and protecting and enhancing the character of the city, which includes its unique historic character (Policy HH1: Conserving and enhancing Exeter's historic environment).

6.461 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.

6.462 Overall, the Full Draft 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

6.463 The Full Draft Plan includes several objectives and policies that directly seek to support community cohesion and safety, namely objectives 4, 8, 9 and 11 and Policies H1: Health and wellbeing and IC3: Community facilities. Policy HW1 sets out the requirement for HIA for larger developments, which must demonstrate how the proposal will promote community inclusion, and safety and wellbeing, whilst Policy IC2 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: The Green Circle, IC4: Sport, recreation and allotment space in new development and IC5: Play areas in new development.

6.464 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 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.

6.465 Overall, the Full Draft 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

6.466 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 HS1: The vitality of our High Streets and centres and IC3: Community facilities. These, alongside numerous other policies, should combine to mitigate the increased pressure from new development. However, Policy STC8: Motorway service area 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: Services, Facilities and Education.

6.467 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 was found to have a potential but uncertain mixed minor positive and minor negative effect overall against this objective.

6.468 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

6.469 The Full Draft 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 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: Active and sustainable travel in new developments makes provision for active travel, public transport and shared mobility, in addition to electric vehicles, whilst Policies STC3: Supporting active travel and STC4: Supporting public transport 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 safeguards a total of seven sites for future transport infrastructure.

6.470 The sites allocated in Policy H2: Housing allocations and windfalls were assessed against SA Objective 8: Sustainable Travel 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.

6.471 Overall, the Full Draft 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

6.472 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: 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: Sustainable Travel, the policies in the

'Sustainable Transport and Communications' section address car use, which will minimise pollution for the reasons outlined under SA Objective 8:

Sustainable Travel. With regard to residential amenity, Policy EJ2: Retention of employment land supports the loss of employment land to an alternative use where the current employment uses have an unacceptable amenity impact of local residents.

6.473 The sites allocated in Policy H2: Housing allocations and windfalls were assessed against SA Objective 9: Pollution 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.

6.474 Overall, the Full Draft 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

6.475 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 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.

6.476 The Full Draft 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 explicitly seeks to protect, enhance and restore biodiversity, whilst Policy NE4: Green infrastructure seeks to protect and enhance the existing green infrastructure network and support the delivery of new green infrastructure. In addition, Policy CC9: Water quantity and quality ensures that there should be no harm on the ecological status of Exeter's water bodies.

6.477 Overall, the Full Draft 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

6.478 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 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.

6.479 The Full Draft Plan incorporates a policy that specifically aims to conserve and enhance the quality and character of the landscape (Policy NE1: Landscape setting areas). Policies relating to the provision of green infrastructure will benefit the overall character and appearance of the area (e.g. Policy NE4: Green infrastructure), while policies requiring high quality design will also provide mitigation (e.g. Policies CC1: Net zero Exeter, HH2: Heritage assets and climate change and D1: Design principles). Policy CC1: Net zero Exeter also supports landscape-led schemes with Policy H9: Gypsy and traveller accommodation and Policy IC6: 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.

6.480 Overall, the Full Draft 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

6.481 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 the proximity of sites to designated heritage assets. Due to the fact most of the sites allocated in Policy H2: Housing allocations and windfalls are

located within 250m of a heritage asset, development is likely to have adverse effects on the historic environment. However, this effect is also dependent on factors such as the design of development.

6.482 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 Exeter's historic environment require development proposals to protect and enhance the unique historic character of Exeter, its cultural offering and identity. Policy HH3: 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. In addition, Policy HS1: The vitality of our high streets and centres 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 does not explicitly protect the historic environment, but sensitive and high quality development is likely to help protect heritage assets and their settings.

6.483 Overall, the Full Draft 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

6.484 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.

6.485 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 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.

6.486 However, the Full Draft Plan includes a number of policies seeking to mitigate flood risk, in particular Policy CC8: Flood Risk and to a lesser extent, Policies CC1: Net zero Exeter and NE2: Valley Parks. A number of policies (Policy CC4: Ground-mounted photovoltaic arrays and IC6: 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.

6.487 Overall, the Full Draft 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

6.488 Only a small number of policies in the Full Draft 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 supports the development of brownfield sites with the Local Plan

allocating a small amount of greenfield development. Policy EJ2: Retention of employment land 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 HS1: The vitality of our High Streets and centres 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: 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.

6.489 Most of the sites allocated in Policy H2: Housing allocations and windfalls 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.

6.490 Overall, the Full Draft 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

6.491 Table 6.16 summaries the likely overall cumulative effect of the Full Draft Plan on each of the 14 SA objectives, as described above.

Table 6.16: Summary of cumulative effects of the whole Full Draft Plan

SA Objective	Exeter Plan
SA1: Climate Change	++/-
SA2: Housing	++
SA3: Economic Growth	++
SA4: Health	+
SA5: Design and 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

6.492 The Full Draft Plan sets out how growth will be planned, facilitated and managed over the Plan period up to 2040. 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 Full Draft 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.

6.493 Most of the effects will be long-term, in that the Full Draft 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).

6.494 The effects which have been identified in the appraisal of the Full Draft 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

6.495 The effects of the Full Draft 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 Draft Plan or reversed through restoration measures in the long-term.

Medium-term Effects

6.496 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 Full Draft Plan when planning proposals are assessed and determined by the City Council.

Long-term Effects

6.497 Long-term, permanent benefits that would result from the Draft 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 Full Draft 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

6.498 A number of recommendations were made at the Outline Draft Plan stage, which were responded to by the Council at that time. Further recommendations were made in a draft version of this SA Report for the Full Draft Plan. All recommendations made at both stages are listed in below along with information about how the Council has responded to these recommendations.

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.

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 CC8: Flood risk

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

- None.

Exeter City Council's Responses to Recommendations

- N/A.

Policy H14: 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.

Policy EJ1: Economic growth in the transformational sectors

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.

Policy HS1: The role of our high streets

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.

Policy STC4: Supporting public transport

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.

Policy NE1: Landscape setting areas

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.

Policy NE2: Valley Parks

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.

Policy NE3: Biodiversity

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.

Policy NE4: Green infrastructure

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.

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.

Policy D1: Design principles

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.

Policy D2: 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.

Policy IC1: Delivery of infrastructure

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.

Policy IC2: 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.

Policy IC6: 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 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. Given the relatively early stage of the Exeter Plan, indicators for all SA objectives have been included. The monitoring framework will be updated at the next stage of the SA (Regulation 19) to focus on the SA objectives against which significant (including uncertain) effects have been recorded.

7.3 The section overleaf sets out a number of 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

- Energy efficiency ratings of new homes.
- Proportion of new homes/employment within 500m of energy networks that have been connected.
- Proportion of new homes/employment that incorporate renewable energy.

Possible Data Sources

- EPC certificate scheme.
- Planning application checks for major developments.

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

Indicators

- Annual dwelling completions.

- Net additional transit and residential pitches (Gypsy, Traveller and Travelling Showpeople) permitted and completed to meet identified requirement.
- Number and proportion of affordable dwelling completion from new development.
- Progress of allocated sites.

Possible Data Sources

- 5YLS monitoring reports.
- Planning application checks.
- Council Tax record.

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

Indicators

- Number of new developments classified within the transformational sectors.
- Permitted applications for alternative uses within established employment areas protected in the Exeter Plan.
- Number of new work hubs, collaborative workspaces or live-work units.
- Number of major development proposals containing an employment and skills plan.

Possible Data Sources

- Planning application checks.

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

Indicators

- Proportion of development for over 30 homes or 1,000 square metres that provide a health impact.

Possible Data Sources

- Planning application checks.

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.

Possible Data Sources

- Planning application checks.

SA Objective 6: To support community cohesion and safety

Indicators

- Number of new community facilities developed.

Possible Data Sources

- Planning application checks.

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

Indicators

- Total gains and losses of services and facilities.
- Progress of infrastructure delivery identified in the Infrastructure Delivery Plan.
- Amount of money received in developer contributions through development.

Possible Data Sources

- Devon County Council.
- Annual infrastructure funding statement.

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

Indicators

- Proportion of new development located within the City Centre and established local service centres/Liveable Exeter sites.
- Length of cycleways created/enhanced.
- Number of new car-free developments.

Possible Data Sources

- Planning application checks.
- Devon County Council.

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 application checks.

SA Objective 10: To conserve and enhance biodiversity and geodiversity

Indicators

- Biodiversity net gains achieved through development.

Possible Data Sources

- Planning application checks.
- Future net gain monitoring database.

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

Indicators

- Amount of new development in an area of high sensitivity as per the findings of landscape sensitivity work.
- Proportion of new development on brownfield land.

Possible Data Sources

- Planning application checks.

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

Indicators

- Condition of Conservation Areas.
- Number and condition of buildings on the Heritage at Risk register.
- Amount of new development approved that causes harm to or loss of significance to heritage assets.

Possible Data Sources

- Conservation area appraisals.
- Historic England heritage at risk register.
- Planning application checks.

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

Indicators

- Proportion of new development built on flood zones against EA advice.
- Percentage of water bodies at good ecological status or potential.
- Percentage of water bodies assessed at good chemical status.

Possible Data Sources

- Planning application checks.
- EA information.

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

Indicators

- Proportion of new development coming forward on brownfield land.
- Amount of ALC grades 1, 2 and 3a lost to development.
- Amount of development coming forward in mineral safeguarding areas or waste consultation zones against DCC advice.

Possible Data Sources

- Planning application checks.

Chapter 8

Conclusions

8.1 The SA of the Full Draft 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 Full Draft 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 Full Draft 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 Full Draft 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 already 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 residential and mixed-use 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 IC1: Delivery of Infrastructure 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, 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 consultation alongside the Full Draft Plan document between October 2023 and January 2024. The consultation responses on the Full Draft Plan and this SA Report will be taken into account in the next stages of the plan preparation process.

LUC

October 2023

Appendix A

Consultation Comments Received in Relation to the SA Scoping Report (March 2022) and the SA Report for the Outline Draft Plan (August 2022)

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.

A.2 A summary of the comments received during each consultation and the SA team's response to these comments are set out below.

Consultation Comments from Statutory Consultees in Relation to the SA Scoping Report

Environment Agency

Comment on Chapter 2: Relevant Plans and Programmes

A.3 We are pleased to see inclusion of Defra's 25 Year Environment Plan.

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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.

Comment on Chapter 3: Baseline Information

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 on Chapter 3: Baseline Information

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 on Chapter 3: Baseline Information

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 on Chapter 3: Baseline Information

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 on Chapter 3: Baseline Information

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

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- Upper Clyst – Moderate Ecological Status
- 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

Comment on Chapter 2 and Appendix A: Relevant Plans, Policies and Programmes

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:

- International – The European Convention on the Protection of Archaeological Heritage.

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- 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, local list and Exeter Historic Environment Record are not relevant for inclusion as part of the plans, policies and programmes information. Information and data

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relating to these suggestions (e.g. heritage assets) will be assessed as part of the appraisal of site options through the SA.

Comment on Chapter 2 and Appendix A: Relevant Plans, Policies and Programmes

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.

Comment on Historic Environment Section in Chapter 3: Baseline Information

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'.
- Paragraph 3.85 and its discussion of non-designated heritage assets could shift to after the paragraphs covering Exeter City's designated heritage

Appendix A Consultation Comments Received in Relation to the SA Scoping Report (March 2022) and the SA Report for the Outline Draft Plan (August 2022)

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.

Comment on Landscape Section in Chapter 3: Baseline Information

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 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.

Comment on Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan

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.
- 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.

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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.

Comment on Chapter 5: Sustainability Appraisal Framework

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.

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- 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, 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

Comment on Chapter 2: Relevant Plans and Programmes

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

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- 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.

Comment on Paragraph 3.29 on Greenspace in Chapter 3: Baseline Information

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.

Comment on Paragraph 3.33 on Green Infrastructure in Chapter 3: Baseline Information

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 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.

Comment on Paragraph 3.81 on Biodiversity in Chapter 3: Baseline Information

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

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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.

Comment on Paragraphs 3.92 to 3.97 on Landscape in Chapter 3: Baseline Information

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.

Comment on Paragraphs 3.112 to 3.114 on Flood Risk and Coastal Change in Chapter 3: Baseline Information

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.

Comment on Paragraphs 3.118 to 3.122 on Air Quality in Chapter 3: Baseline Information

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.

Comment on Paragraphs 3.143 to 3.147 on Water Quality in Chapter 3: Baseline Information

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.

Comment on Chapter 3: Baseline Information

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.

Comment on Open Spaces and Recreation Section in Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan

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.

Comment on Biodiversity Section in Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan

A.70 Natural England welcomes the acknowledgement that development should not only avoid harm to biodiversity but should also contribute to it's '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.

Comment on Landscape Section in Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan

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.

Comment on Natural Resources and Pollution

Section in Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan

A.74 Natural England agrees that avoiding the loss of best and most versatile agricultural land is a key issue for the Local Plan.

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.

Comment on SA Objective 1: To achieve net zero emissions and support adaptation to unavoidable

climate change in Chapter 5: Sustainability Appraisal Framework

A.79 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 on SA Objective 4: To improve the physical and mental health and wellbeing of residents and reduce health inequalities in Chapter 5: Sustainability Appraisal Framework

A.81 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 on SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable

and active alternatives in Chapter 5: Sustainability Appraisal Framework

A.83 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 on SA Objective 10: To conserve and enhance biodiversity and geodiversity in Chapter 5: Sustainability Appraisal Framework

A.85 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 on SA Objective 11: To conserve and enhance the character and distinctiveness of the

landscape in Chapter 5: Sustainability Appraisal Framework

A.87 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 on SA Objective 14: To support efficient use of resources, including land, minerals and waste in Chapter 5: Sustainability Appraisal Framework

A.89 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.

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.

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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 on Tables 4.1, 5.1 to 5.2 and 6.1 to 6.15

A.95 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 on Paragraph 5.17

A.97 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 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.

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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 on SA Objective 9

A.100 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 on Paragraph 6.267

A.102 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

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located on best and most versatile agricultural land, with likely adverse cumulative effects on soils.

Comment on Table A.1 in Appendix A

A.104 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,

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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 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

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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 Historic Environment, Policy HH2: Heritage assets and climate change and Policy HH3: 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. 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

Comment on Newcourt Road, Topsham (Site ID 91, 92, 93 and 94)

A.123 Serious concerns about the compatibility of the Newcourt sites with the strategy.

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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:

- 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.

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- 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. 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.

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

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.

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- Passengers will need to travel from the destination station to their ultimate destination, potentially significantly further increasing the journey distance to and from stations.

A.137 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.138 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.

A.139 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.

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A.140 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.141 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.142 The criteria in relation to SA Objective 8 has been updated (see Appendix D) as set out below:

- 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.143 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.

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A.144 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.

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

A.145 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 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.146 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.147 Exeter City Council's assessment of sites 91 and 94 against SA7 is wrong.

SA Team's Response/Action Taken

A.148 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

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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.

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

A.149 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.150 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.151 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.152 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

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are not accessible to the general public. Therefore, a manual review of the 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.

Comment on Mitigation

A.153 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.154 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.155 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.156 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 Topsham's main roads would materially contribute to off-setting the increase in road traffic caused by the developments.

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- 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.157 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.

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.

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 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.29 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.30 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.31 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.32 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 aim 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.33 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.34 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 PM_{2.5} 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.35 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.36 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.37 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.38 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.39 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.40 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.41 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.42 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.43 Defra, Waste Management Plan for England (2013) – Sets out the measures for England to work towards a zero waste economy.

B.44 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.45 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.46 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.47 Natural England, Green Infrastructure Framework (2023) – 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.48 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.
- 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.49 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.50 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.51 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.52 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.53 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 1st September 2020.

B.54 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.55 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.56 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;
- 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.57 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.58 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.59 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.60 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.61 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.62 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.63 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. 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.64 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.65 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.66 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.67 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.68 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.69 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.70 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.71 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.72 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.73 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.74 The Heritage Alliance, Heritage 2020 – Sets out the historic environment sector's plan for its priorities between 2015 and 2020.

B.75 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.76 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.77 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.78 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.79 Managing Water Abstraction (2021) – The overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.80 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.81 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.82 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.83 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.84 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.85 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.86 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.87 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 (ULEVs), 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.88 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.89 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.90 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.91 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.92 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.93 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.94 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.95 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.96 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.97 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.98 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.99 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.100 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.101 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.102 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.103 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.104 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.105 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.106 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.107 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.108 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;

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- 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.109 Draft 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.110 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.111 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.112 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.113 10th Devon Local Aggregate Assessment 2011-2020 (2021) – 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.114 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;
- 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.115 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.116 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.117 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

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- 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
- 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.118 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;

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- 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.119 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.120 The Development Delivery Plan reached the stage of the Publication Version (July 2015) but was not progressed any further.

B.121 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;

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- To manage growth and promote economic development; and
- To improve the health and wellbeing of our local communities.

B.122 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.123 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.124 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.125 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.126 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.127 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.128 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.129 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;
- 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;

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- 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.130 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.131 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.132 Exeter Five Year Housing Land Supply Statement (September 2021) – This statement presents the current five year housing land supply position for Exeter City Council. It applies from September 2021 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 2021 to 31st March 2026.

B.133 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.134 Exeter Housing Strategy 2016-2020 – The key objectives are identified as:

- Address housing need and vulnerability – Providing housing options, advice and support to all residents.
- Provide more housing – In particular by exploring ways of delivering new affordable housing across a range of tenures.
- Be a good landlord – Raising the standards of our own stock and landlord services, and by influencing the improvement of standards in the private rented sector.

B.135 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.136 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.137 Homelessness Strategy: Working Better Together. Exeter City Council, Teignbridge District Council (2016-2021) – The joint Exeter City and Teignbridge District Council Homelessness Strategy 2016 to 2021 sets out how

the two councils, and their partners, will work together to tackle homelessness over the next five years. There are four themes with the following aims:

- Increase access to good, safe and affordable accommodation;
- End the use of bed and breakfast for families and young people;
- Bring rough sleeping to an end;
- Work together to put customers first;
- Offer help at times and places where clients need them most;
- Make sure help is accessible for everyone;
- Improve the health and wellbeing of homeless people;
- Help protect the vulnerable from violence and abuse;
- Support people who are released from prison, hospital, or leaving the armed forces;
- Help people manage household finances when faced with homelessness;
- Target investment to reduce homelessness; and
- Maximise opportunities with partners and provide better value for money.

B.138 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.139 Exeter City Council Air Quality Annual Status Report (2022) – The status report that is produced annually monitors air quality within the City. NO₂ levels in Exeter in 2021 were slightly above those measured in 2020 but show a

noticeable reduction on pre-pandemic levels. The Annual Status Report also summarises the results of particulate pollution measurements (PM₁₀ and PM_{2.5}). No areas in the City are thought to exceed the objectives for this type of air pollution. Measured PM_{2.5} concentrations were well below the relevant objective level and PM₁₀ concentrations have shown a steady decline since 2006.

B.140 Exeter Authority Monitoring Report 2020-2021 – This monitoring report covers the period 1st April 2020 to 31st March 2021 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.141 Exeter City Futures Net Zero Exeter 2020 Plan (April 2020) – 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;

- An Analytical Approach; and
- Locally Controlled Finance.

B.142 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.

Surrounding Development Plans

B.143 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.144 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 2002 and January 2023. The Draft Local Plan proposes to allocate a total of 18,167 new homes and increase the level of new employment floorspace.

B.145 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.146 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.

B.147 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.148 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.149 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. All consultation comments are currently being considered which will inform the Proposed Plan combining Parts 1, 2 and 3 of the Draft Plan. The Draft Plan has identified 24 small site options (25-50 homes) that were subject to consultation. Responses to the Proposed Submission Local Plan are currently being considered following consultation.

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 130,800 in 2021, compared to 117,800 in 2011 (11.1% increase). This is higher than the overall increase for England over the same period (6.6%). The gender split is 67,100 females and 63,700 males. The largest age category (by five-year age group) within the population is 20-24 years (16,400 people), and second largest is 15 to 19 years (11,800 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 650 homes per annum [\[See reference 29\]](#).

C.4 The following numbers of homes were completed in Exeter in the reporting year April 2020 to March 2021:

- 585 net additional homes (not including Purpose Built Student Accommodation); and

- 895 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

C.6 Table C.2 shows how housing completions in 2021/22 amount to 585 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 2021/22 shows a rise in housing completions on the 2019/20 and 2020/21 figures. Exeter's five year (2022/23 – 2026/27) housing requirement is 3,413 homes, as outlined in the Five Year Housing Supply Statement [\[See reference 30\]](#). The deliverable supply of housing identified in the next five years (2022/23 to 2026/27) is summarised in Table C.3 below and shows there is a total net supply of 3,275 homes. Therefore, against the five year housing requirement (3,513), the Council is currently able to demonstrate a supply (3,275) of four years and ten months for the period commencing 1 April 2022.

C.7 Supporting Exeter's housing delivery is the Liveable Exeter [\[See reference 31\]](#) housing programme that will deliver 12,000 new homes in new urban communities on existing brownfield sites. This transformational housing delivery programme will deliver eight projects across the City [\[See reference 32\]](#).

C.8 Exeter University expects the number of students in need of accommodation to increase by around 800 per year. There is expected to be a modest growth in student numbers with growth at lower levels than the last 15 years. In 2026/27, students numbers are expected to fall [\[See reference 33\]](#) [\[See reference 34\]](#).

C.9 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 [\[See reference 35\]](#).

Table C.3: Total net housing supply 2022/23 to 2026/27

Type of Site	2022/23	2023/24	2024/25	2025/26	2026/27	Total 5 Year Supply (Net)
Major site with consent/ resolution to approve	768	600	771	756	254	3,149
Small site with consent/ resolution to approve	36	90	0	0	0	129
Identified sites without planning consent	0	0	0	0	0	0
Windfalls	0	0	0	0	0	0
Total Net Supply	904	690	771	756	254	3,275

Housing Stock and Condition

C.10 The majority of residential properties in Exeter are terraced (33%) and semi-detached (25%), unlike the more predominant detached houses in more rural parts of Devon. Table C.4 provides a summary of the housing stock in Exeter in comparison to the surrounding districts. The 2021 Census recorded that Exeter has lower levels of owner-occupation at 58.3% compared to the South West at 67% and nationally at 62.3%, and also had the highest level of social stock in Devon of 16.6%, similar to the national level of 17.1%. The level of private rented accommodation in Exeter was 25.1%, reflecting the nature of the City when compared to more rural districts in Devon where levels of private rent is lower [\[See reference 36\]](#).

C.11 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 [\[See reference 37\]](#).

C.12 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.

Table C.4: Housing stock by district in 2011 [\[See reference 38\]](#)

Stock	East Devon	Exeter	Mid Devon	Teignbridge
Detached House	24,567 (44%)	6,926 (14%)	13,079 (37%)	21,165 (38%)
Semi-detached	16,399 (26%)	13,072 (25%)	9,700 (29%)	13,883 (25%)
Terraced	12,484 (20%)	16,707 (33%)	7,811 (23%)	13,082 (24%)
Purpose Built Flat	6,067 (10%)	10,363 (20%)	2,133 (6%)	4,874 (9%)
Flat in Converted or Shared House	3,057 (5%)	3,002 (6%)	720 (2%)	2,919 (5%)
Flat in Commercial Building	969 (2%)	571 (1%)	358 (1%)	719 (1%)
Total	63,543	50,641	33,801	55,642

Housing Affordability

C.13 The housing market in Exeter is expensive and residents struggle to afford homes. This is due to a number of reasons:

- As of April 2023, the average house price in the UK was £286,489, whereas the average house price in Exeter was £321,593 [\[See reference 39\]](#);
- 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.14 Within the South West as a whole, 5.76 households were assessed as homeless per 1000 between 2021-22. During the same period, 8.63 households in Exeter were assessed as homeless per 1000, which is above the South West figure [\[See reference 40\]](#). The Exeter Housing Strategy (2016-2020) states that homelessness is a significant problem for Exeter even though the City is doing well economically. Numbers of rough sleepers have increased significantly. The Exeter and Teignbridge Homelessness Strategy 2016-2021 outlines that reasons for homelessness include availability and affordability in the private rented sector remains challenging, lack of affordable accommodation generally, behaviour and substance abuse, mental health problems and relationship breakdown.

Health

C.15 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.16 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 [\[See reference 41\]](#).

C.17 The Devon County Council Public Health Annual Report (2022-23) 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.18 Life expectancy at birth in 2021 in Exeter was 78.8 years for males and 84.4 years for females. The figures for Exeter are lower for males than the regional value of 80.1 but equal for females. 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 [\[See reference 42\]](#).

Obesity

C.19 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 [\[See reference 43\]](#).

C.20 20.2% of adults were classified as overweight or obese in the period 2021/22 [\[See reference 44\]](#). This is lower than the regional value of 25.7% and England value of 25.9%. The value in Exeter has dropped from 59.8% since 2015/16. Within Exeter in Year 6 at school, 18.1% of children were classified as overweight (including obesity) in the period 2019/20. This figure has followed a decreasing trend since 2013/14, decreasing from 33.7% [\[See reference 45\]](#).

C.21 The number of hospital admissions with a primary diagnosis of obesity is not reported at local authority level. In 2018/19 Devon reported 11 persons per 100,000 finishing admissions episodes during this period. This figure is lower than the regional figure of 14 and the national figure of 20. The figure for Devon was split between males and females at five persons per 100,000 and 18 persons per 100,000 respectively [\[See reference 46\]](#). Across England the number of reported hospital admissions directly attributed to obesity in 2018/19 was 11,117 an increase of 4% on 2017/18, when there were 10,660 admissions. However, the number of admissions where obesity was a factor in 2018/19 (876,000) increased by 23% on the 2017/18 figure [\[See reference 47\]](#).

Perception of Wellbeing

C.22 Residents of Exeter reported having slightly lower levels of life satisfaction (7.3 out of 10.00) than the average for UK 7.54 in the period 2021/22. 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 also declined to 7.6 in the period 2021/22 and are lower than the UK average of

7.78. Average figures recorded relating to ‘happiness’ are lower than the previous seven years (7.2) in the 2021/22 period. Average levels of anxiety have increased to 3.6 for the period 2021/22, and are higher than all previous years. Average ratings of life satisfaction, worthwhile, happiness and anxiety have deteriorated within Exeter [\[See reference 48\]](#).

C.23 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 [\[See reference 49\]](#).

C.24 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. Significant increase in excess weight in children during 2021/22 may have been driven by lower levels of exercise and changes in diet and daily routines during the pandemic [\[See reference 50\]](#).

Social Isolation

C.25 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 [\[See reference 51\]](#). 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.26 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 [\[See reference 52\]](#).

C.27 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 [\[See reference 53\]](#).

C.28 The Audit of Outdoor Recreation Facilities [\[See reference 54\]](#) 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 [\[See reference 55\]](#). Work underway for the new Parks and Greenspace Strategy has found the following [\[See reference 56\]](#):

- 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.
- There remain problems of increasing costs and reduction in budgets, leaving limited options to safely maintain the land and assets the Council holds.

C.29 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 [\[See reference 57\]](#).

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 144ha of publicly accessible land. 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 [See reference 58]. 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 59]. 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:

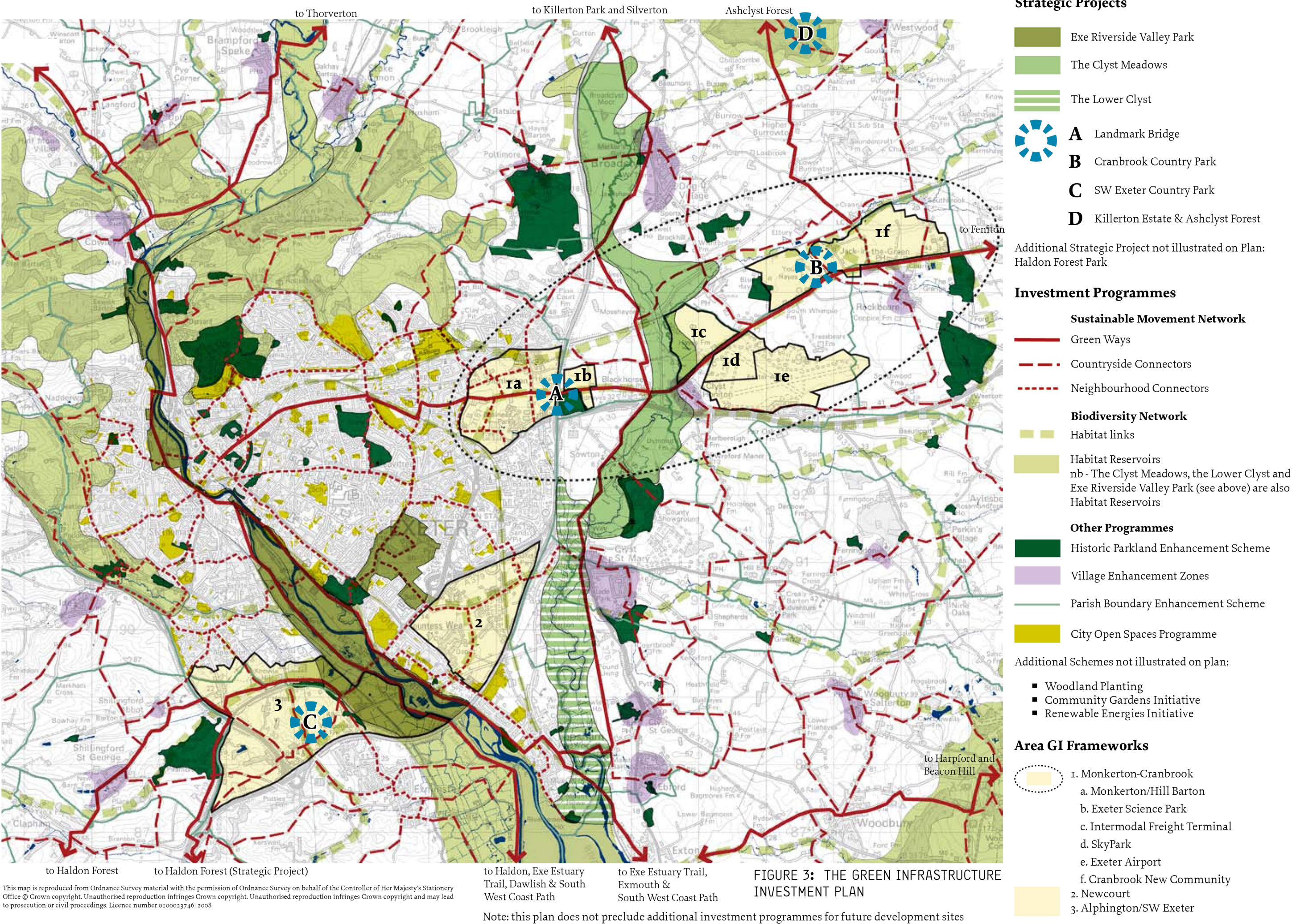
- Provides a framework to guide sustainable development;
- Enhances the accessibility of key assets, leisure facilities, open and semi natural green space, wildlife areas and the countryside;
- Identifies new opportunities for walking, cycling and other forms of sustainable transport to enhance the existing 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;

Appendix C Baseline Information

- 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.

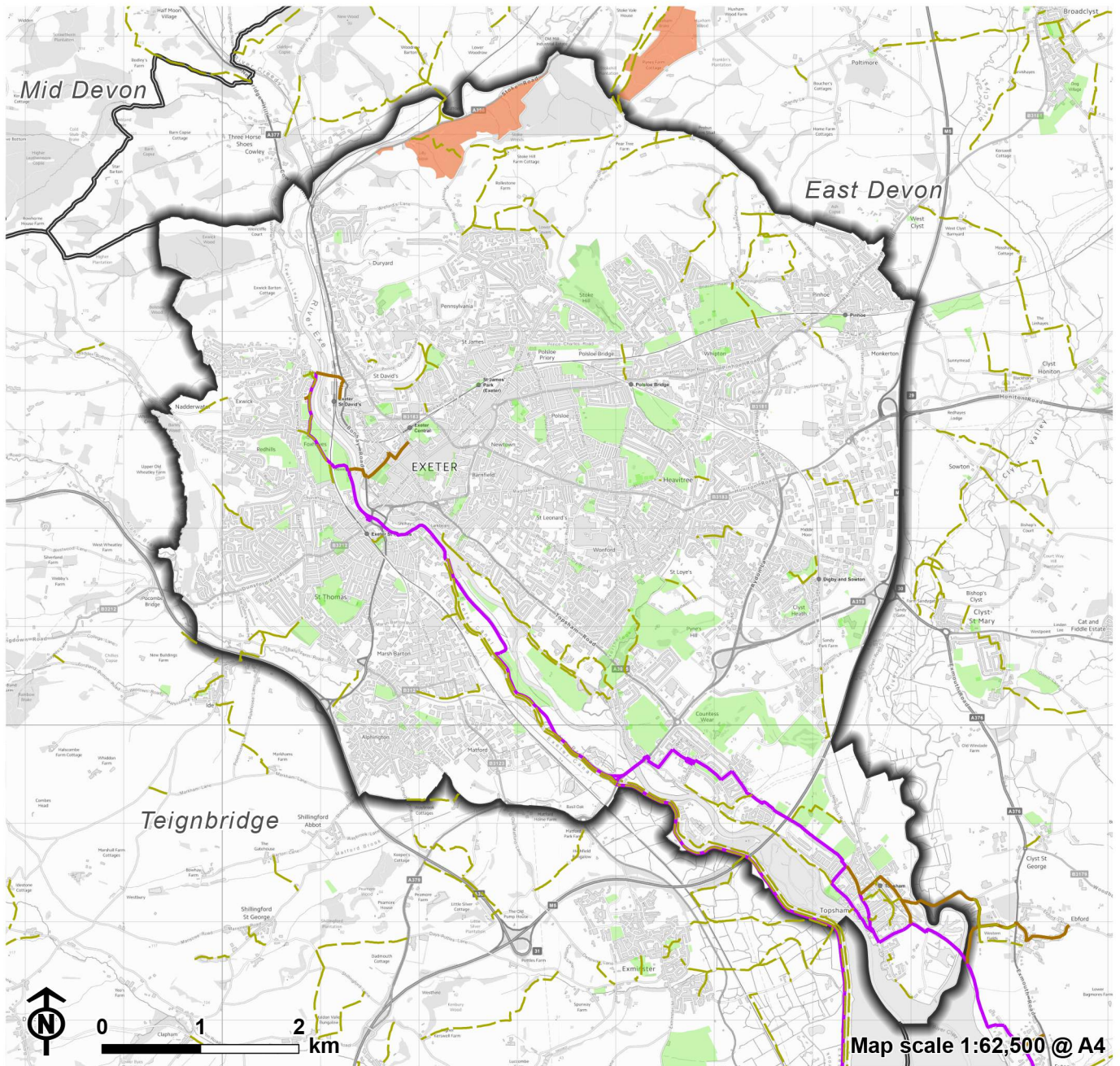
C.33 The Green Infrastructure Strategy (December 2009) outlines what is proposed where and why, including Strategic Projects and how the strategy will be executed. This is illustrated in Figure C.1, which is taken from the Strategy [See reference 60].

Figure C.1: Green Infrastructure Investment Plan



C.34 Devon County Council is responsible for 3,108 miles (5,002km) 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 61]. 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 62]. 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.



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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 2021-22) estimated that 20% 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 20.1% for the same period. It is reported that 72.7% 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 70.8% [\[See reference 63\]](#).

C.36 In Exeter 80.4% of people walk or cycle once a week. The walking and cycling average was higher than the national average for England at 71.2% [\[See reference 64\]](#).

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 [\[See reference 65\]](#). 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 [\[See reference 66\]](#). 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.5 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.5: 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 [\[See reference 67\]](#) 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.6 shows Exeter City and its neighbouring authorities ranked out of the 326 local authorities in England.

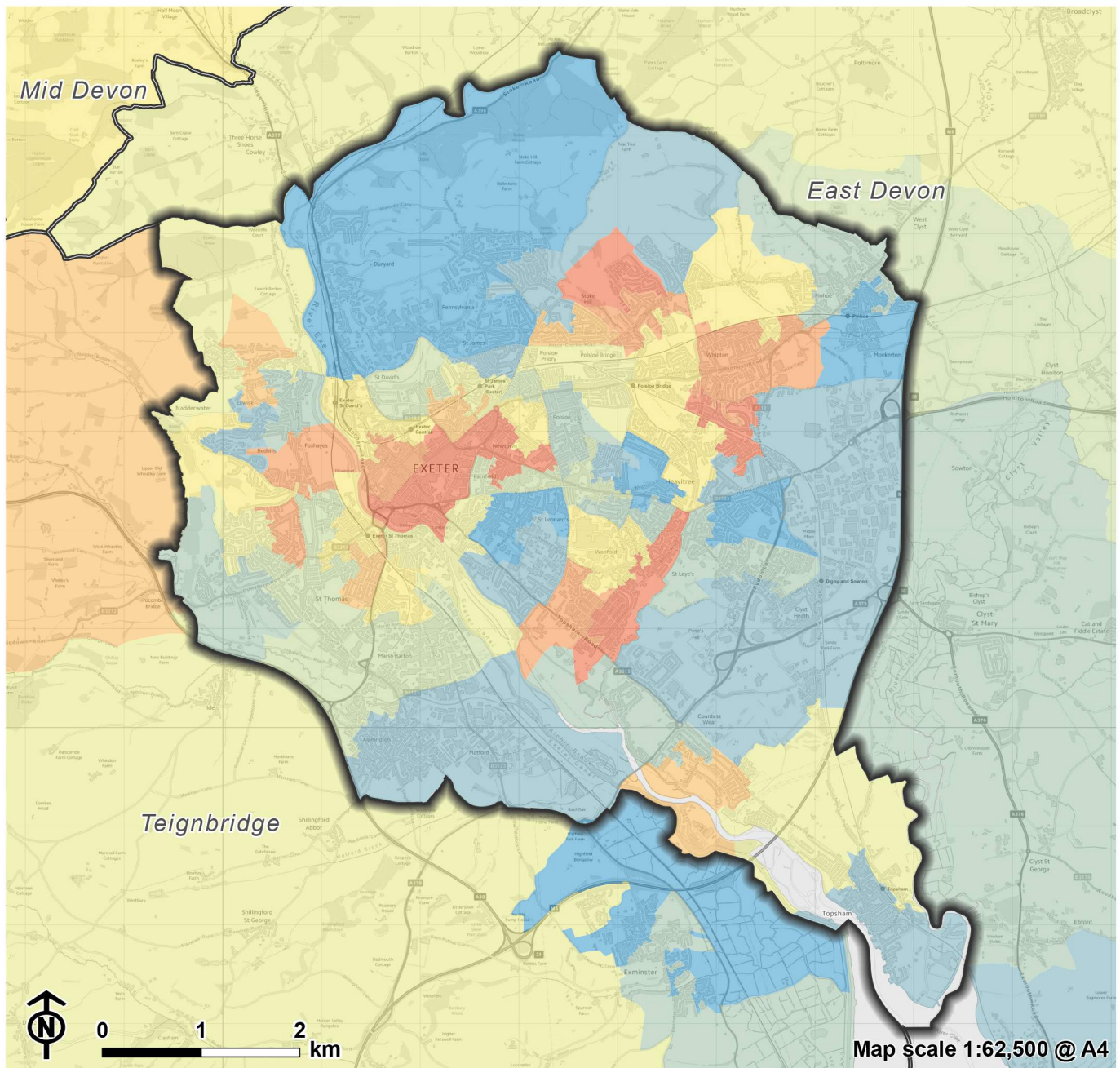
Table C.6: Deprivation ranking by district in England

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.



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Figure C.3: Distribution of deprivation

- Exeter City boundary
- Neighbouring authority

Index of Multiple Deprivation

- 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 68]. The overall crime rate in Exeter in 2022 was 61 crimes per 1,000 people. This compares poorly to Devon's overall crime rate, coming in 32% higher than the Devon rate of 46 per 1,000 residents. However, crime rates have not significantly worsened since 2018 when the crime rate per 1,000 people in Exeter City was 80. For England, Wales, and Northern Ireland as a whole, Exeter is the 32nd safest major town, and the 1,639th most dangerous location out of all towns, cities, and villages. As of 2023, the crime rate in Exeter is 0.86% lower than the South West and 26% lower than the England, Wales and Northern Ireland overall figure.

C.45 The most common crimes in Exeter are violence and sexual offences, with 3,512 offences occurring during 2022, giving a crime rate of 28. This is 3% lower than 2021's crime rate of 31 and the same as 2020's crime rate of 28. Exeter's least common crime is robbery, with 34 offences recorded in 2022, an increase of 7% from 2020's of 0.35 crime rate per 1,000 residents.

C.46 The Exeter Community Safety Partnership [See reference 69], 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 [\[See reference 70\]](#). 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 [\[See reference 71\]](#).

C.48 Exeter accounts for more than a quarter of employment in the county and reports an employment density (1.14) above the national average (0.84) [\[See reference 72\]](#). 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 [\[See reference 73\]](#). 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.7 below shows the breakdown of employee jobs by industry [\[See reference 74\]](#).

Table C.7: Employee jobs by industry in Exeter (2021)

Industry	Employee Jobs	Percentage
Human Health and Social Work Activities	20,000	20.8%
Wholesale And Retail Trade; Repair of Motor Vehicles and Motorcycles	13,000	13.5%
Education	12,000	12.5%
Professional, Scientific and Technical Activities	9,000	9.4%
Administrative and Support Service Activities	7,000	7.3%
Public Administration and Defence; Compulsory Social Security	8,000	8.3%
Accommodation and Food Service Activities	6,000	6.2%
Information and Communication	4,500	4.7%
Construction	3,500	3.6%
Manufacturing	3,000	3.1%
Transportation and Storage	3,000	3.1%
Financial and Insurance Activities	1,750	1.8%
Water Supply; Sewerage, Waste Management and Remediation Activities	1,750	1.8%
Real Estate Activities	1,250	1.3%

Industry	Employee Jobs	Percentage
Other Service Activities	1,500	1.6%
Arts, Entertainment and Recreation	1,500	1.6%
Electricity, Gas, Steam and Air Conditioning Supply	1,250	1.3%
Mining and Quarrying	0	0%

C.51 Between April 2022 to March 2023 the rate of economically active residents in the South West was 80.7%. During the same period the figure for Exeter was 75.8%. Furthermore, in Exeter 13.6% were self-employed, and 2.8% unemployed, with the remaining either full-or part-time employed. This compared to 3.6% unemployment nationally [\[See reference 75\]](#). 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 2022, gross weekly pay in Exeter was £628.00, which was slightly higher than the regional average of £619.80 but lower than the national average of £642.20.

Business Stock

C.53 In 2021 Exeter had a total of 4,490 Business Enterprises, of which 96.7% were Micro or Small [\[See reference 76\]](#). 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 [\[See reference 77\]](#).

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 [\[See reference 78\]](#).

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.

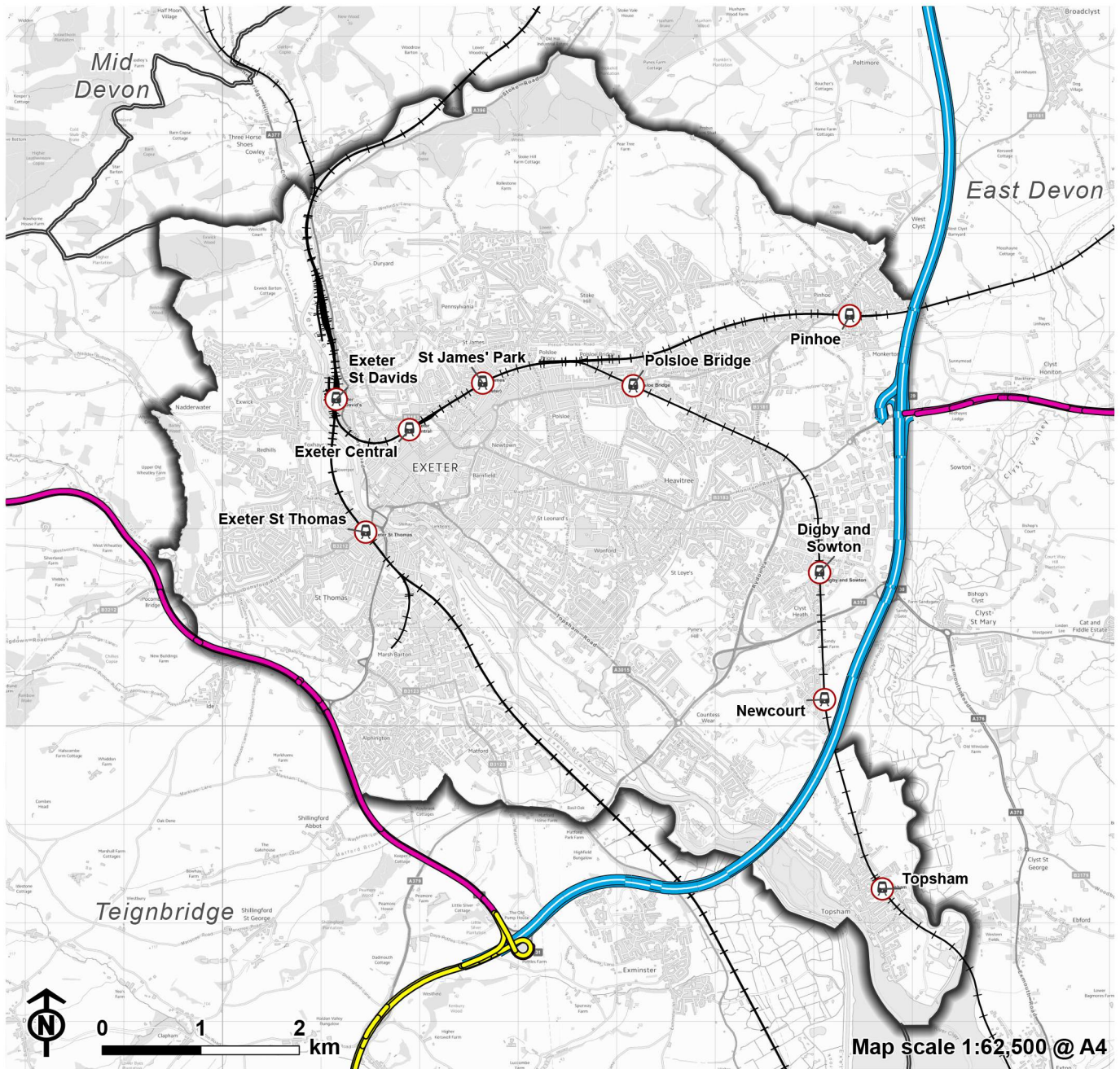
C.57 Exeter was ranked the 30th biggest retail centre in the UK by CACI in 2011 with an expenditure of £710m, and the second largest primary retail centre in the South West. This position leads to the wholesale and retail sector being the second highest employment sector in the Exeter.

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.

Transport

C.59 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.60 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.



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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.61 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.62 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.63 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.64 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.65 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.66 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.67 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.68 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.69 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.70 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.71 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.72 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.73 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.74 Eight rapid electric vehicle charging hubs were approved across Exeter and installation began during 2021/22.

Biodiversity

C.75 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.76 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.77 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.78 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.79 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 2021, 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.8.

C.80 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.81 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.

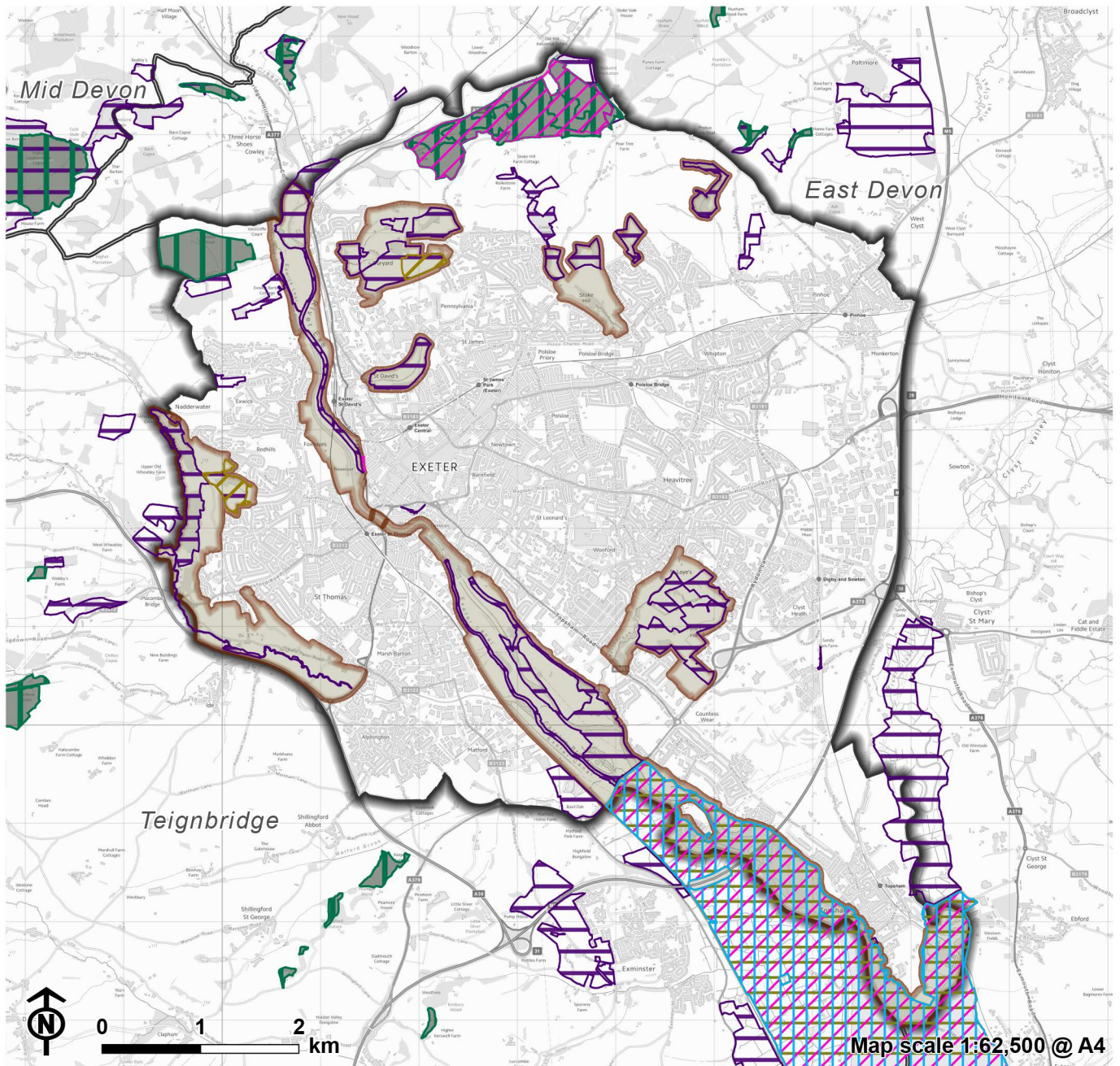
C.82 Developer contributions collected through Habitats Mitigation payments, the Community Infrastructure Levy and Section 106 Agreements are ways in which developers are required to contribute towards mitigation of the impact of their development. In 2020/21 Exeter City Council provided £80,117 of developer 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.83 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.

Table C.8: Natural England's SSSI Condition Assessment 2021

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%
Stoke Woods SSSI	100%	14.83%	85.17%	0%
Devon	74.88%	29.48%	45.40%	5.15%
England	88.51%	38.13%	50.38%	5.22%



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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.84 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.85 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.86 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.87 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.88 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.89 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.90 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.91 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.

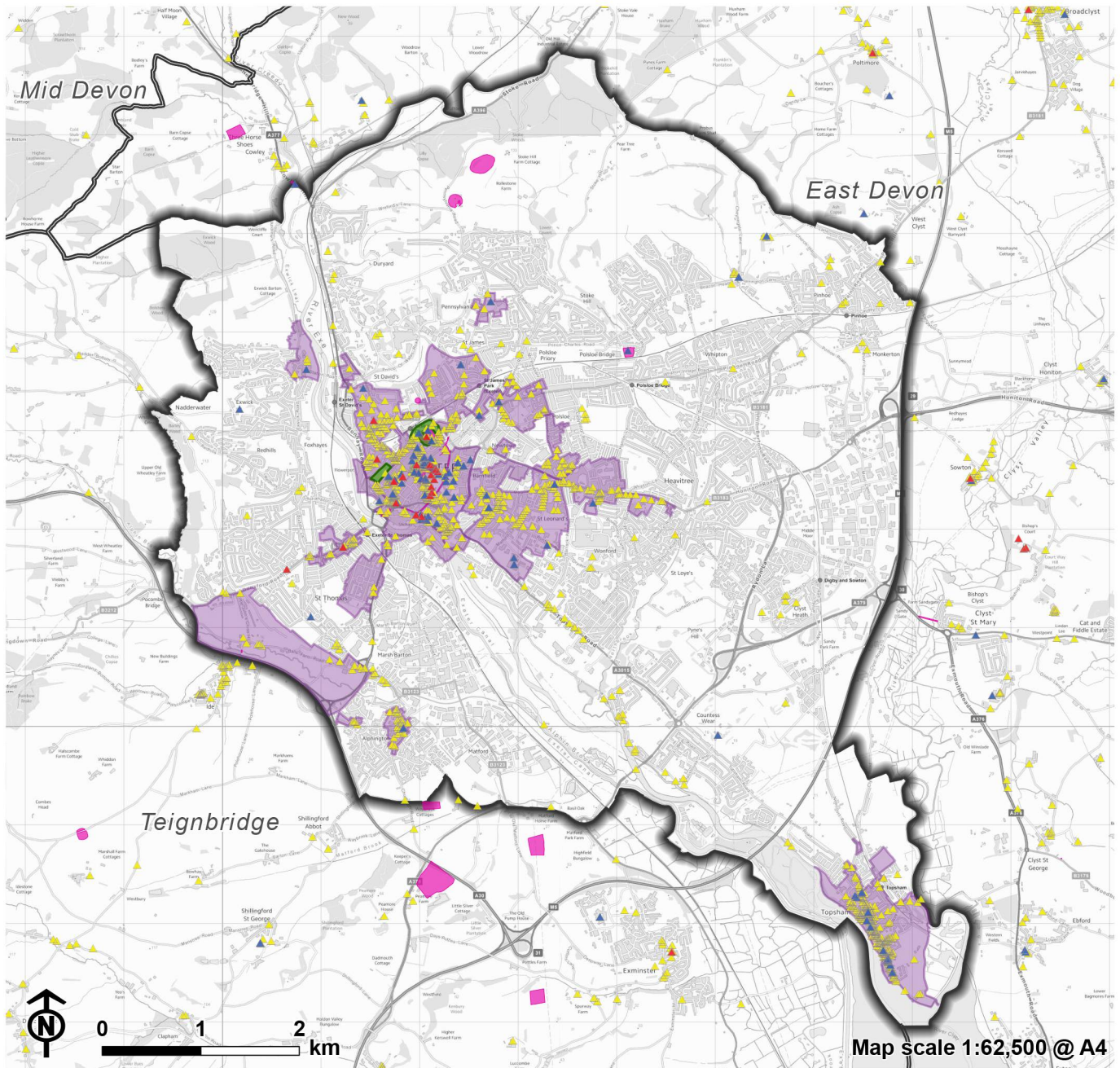
Heritage at Risk

C.92 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.93 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.9 below [\[See reference 85\]](#).

Table C.9: Heritage assets on Historic England's Heritage at Risk Register in Exeter

Designated Site	Category	Condition
Church of St Thomas and 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



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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.94 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.95 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.96 Devon has been divided into unique geographical areas sharing similar character and recognisable at different scales:

- 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:

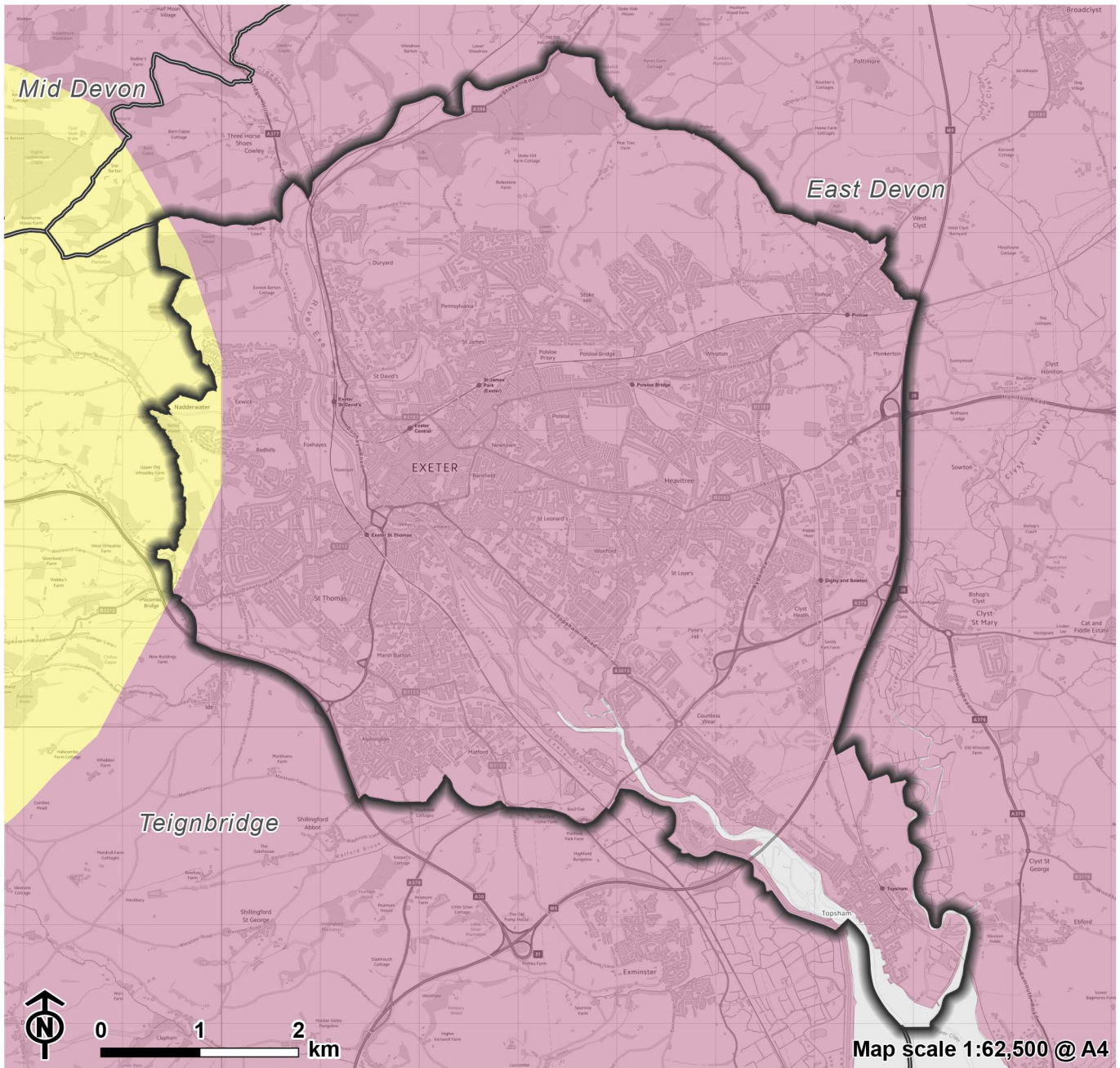
- 37 Landscape Character Types (LCTs), each sharing similar characteristics. Some types of landscape occur throughout the County, for example, 'sparsely settled farmed valley floors' while others may occur only once or twice, for example, 'upland moorland with tors'.

C.97 Exeter is located within the Devon Redlands NCA (148) (see Figure C.8) [See reference 87] 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 88].

C.98 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 89].

C.99 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.



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Figure C.8: National Character Areas

- Exeter City boundary
- Neighbouring authority

National Character Areas

- Devon Redlands
- The Culm

Climate Change

C.100 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.101 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 [\[See reference 90\]](#).

C.102 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 [\[See reference 91\]](#):

- 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.103 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 [\[See reference 92\]](#).

Climate Change Predictions

C.104 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. Nine out of ten of the warmest years for the UK since 1884 have occurred since 2002. The year 2020 was third warmest, fifth wettest and eight sunniest on record for the UK [\[See reference 93\]](#).

C.105 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.10 outlines the projected changes in climate for the South West.

Table C.10: Projected changes in climate for the South West under the high emissions scenario (2018 State of the Environment Report)

Year	Likelihood	Winter Mean Temperature	Summer Mean Temperature	Annual Mean Precipitation	Winter Mean Precipitation	Summer Mean Precipitation
2020s	Very likely to be greater than (>)	0.2oC	0.4oC	-3%	-5%	-27%
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.106 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.107 The Government regularly publishes Local Authority and regional carbon dioxide emissions national statistics [\[See reference 94\]](#). Emissions for Exeter between 2005-2021 have fallen from 7.8t per capita to 3.1t per capita. Emissions in the plan area fell most years between 2005 and 2021 as shown in Table C.11.

Table C.11: Carbon dioxide emissions estimates in Exeter 2005-2021

Year	Total Emissions	Per Capita Emissions
2005	885.3kt CO ₂	7.8t
2006	692.1kt CO ₂	6.1t
2007	672.9kt CO ₂	5.9t
2007	695.2kt CO ₂	6.1t
2009	615.7kt CO ₂	5.4t
2010	640.9kt CO ₂	5.5t
2011	577.3kt CO ₂	4.9t
2012	627.6kt CO ₂	5.3t
2013	613.9kt CO ₂	5.1t

Year	Total Emissions	Per Capita Emissions
2014	550.3kt CO ₂	4.5t
2015	586.7kt CO ₂	4.7t
2016	483.2kt CO ₂	3.8t
2017	447.8kt CO ₂	3.5t
2018	443.6kt CO ₂	3.4t
2019	414.1kt CO ₂	3.2t
2020	375.2kt CO ₂	2.8t
2021	401.0kt CO ₂	3.1t

C.108 The greatest drop in carbon dioxide emissions between 2005 and 2021 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.12.

Table C.12: Changes in carbon dioxide emissions by sector for Exeter between 2005 and 2021

Source of Emissions	2005	2021
Industry	135.5kt	67.9kt
Commercial	211.5kt	52.9kt
Public Sector	178.0kt	40.7kt
Domestic	230.0kt	132.4kt
Transport	132.8kt	102.5kt
Agriculture	1.9kt	3.9kt
Grand Total	885.3kt	401.0kt

C.109 In 2021 transport was still the largest source of carbon dioxide in the UK, accounting for 35.8% 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 [\[See reference 95\]](#). Transport emissions include freight and passenger transport, both for private and business purposes. CO₂ emissions in Devon are dominated by transport emissions (51.9%), 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.110 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.111 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 [\[See reference 96\]](#). 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.112 The Department for Business, Energy and Industrial Strategy produced the following consumption figures for Exeter in 2020 [\[See reference 97\]](#):

Appendix C Baseline Information

- All fuels – A total of 161.9Ktoe 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 0.3Ktoe through domestic and industrial and commercial use.
- Petroleum – A total of 33.7Ktoe predominantly from road transport.
- Gas – A total of 81.1Ktoe predominantly through domestic use.
- Electricity – A total of 44Ktoe through domestic and industrial and commercial use.
- Bioenergy and wastes – A total of 2.7Ktoe predominantly through industrial and commercial use.

C.113 The changes in consumption by energy type for Exeter are shown in Table C.13. With the exception of energy from bioenergy and wastes, the consumption of all energy types fell between 2005 and 2020.

Table C.13: Energy consumption in Exeter by type

Energy Type	Energy Consumption (2005)	Energy Consumption (2020)
Coal	0.5Ktoe	0.1Ktoe
Manufactured Fuels	0.8Ktoe	0.3Ktoe
Petroleum	39.2Ktoe	33.7Ktoe
Gas	187.1Ktoe	81.1Ktoe
Electricity	50.9Ktoe	44Ktoe
Bioenergy and Wastes	2.2Ktoe	2.7Ktoe
Total	280.7Ktoe	161.9Ktoe

Flood Risk

C.114 Exeter City Council prepared a Strategic Flood Risk Assessment (SFRA), Level 1 published in 2008 and Level 2 in 2014 [\[See reference 98\]](#). 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.

C.115 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 [\[See reference 99\]](#) outlines the key sources of potential flood risk within Exeter. The flood risk is mostly from river flooding in the lower reaches of the River Exe catchment and also from the sea in the tidal influenced areas and from surface water runoff. In localised areas there is a risk of flooding from the relatively steep sided valleys that discharge laterally into the Rivers Exe or Clyst. The River Exe and its tributaries pose 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. The extent of flood risk zones are shown in Figure C.9, which shows all areas within flood zones 2 and 3.

C.116 Some areas at risk of flooding within Exeter City already have man-made defences (such as raised walls, embankments, flood channels and storage areas) that can act to decrease flood risk in vulnerable areas. These structures are generally located close to the main rivers and watercourses where flood relief or alleviation schemes have been previously carried out to specific design criteria and are the responsibility of the Environment Agency [\[See reference 100\]](#).

C.117 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.

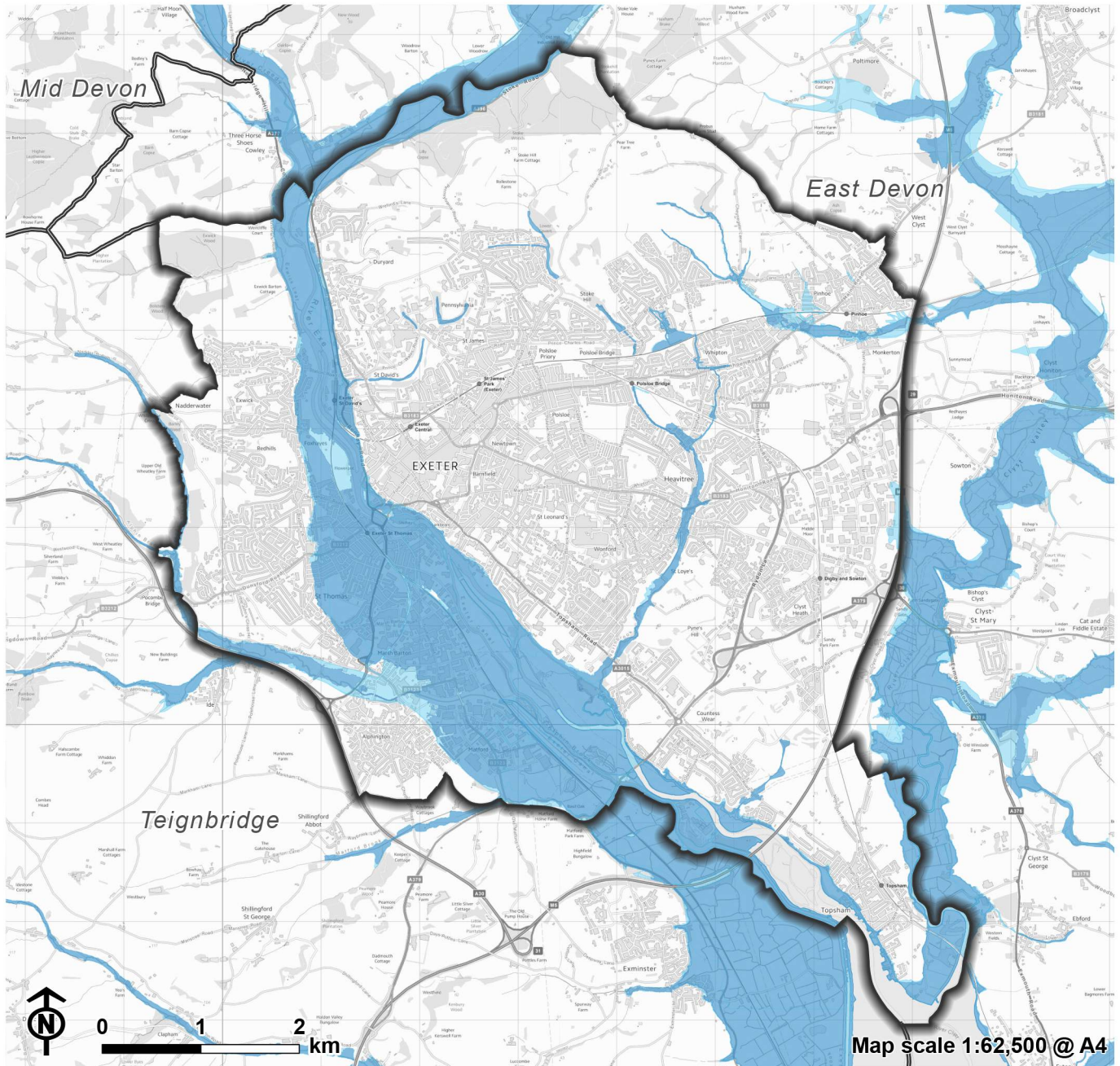
C.118 Devon County Council are the Lead Local Flood Authority as defined by the Flood and Water Management Act 2010 and are responsible for managing local flood risk in Devon (i.e. risks of internal property flooding from surface water, ground water and ordinary (smaller) watercourses). This excludes flood risk from the sea and main rivers, which is the Environment Agency's responsibility.

Exeter Plan Sustainability Appraisal Report

Exeter City Council



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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.119 The provision of renewable energy is an important element of addressing climate change and Devon is rich in renewable energy resources.

C.120 Exeter has increased its capacity to generate electricity from renewable sources from 2014 to 2020 from 7.4MW installed capacity to 18MW installed capacity [See reference 101]. 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 2021/22, 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: In 2021/22 works progressed to develop this major renewable energy scheme in the city. The 1.2MW ground mounted solar array and battery storage facility was completed in 2022 (after the reporting period) to provide a renewable energy supply to the 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.121 Energy generation from renewable sources also increased in Exeter during the period 2014 to 2020 from 8,216MWh in 2014 to 15,550MWh.

Pollution

Air Quality

C.122 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.123 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.124 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 [\[See reference 102\]](#).

C.125 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 2022 Air Quality Annual Status Report identified that 2021 levels of nitrogen dioxide were below the objective at every site except East Wonford Hill. There were no exceedances of the proxy for the hourly nitrogen dioxide objective in 2021.

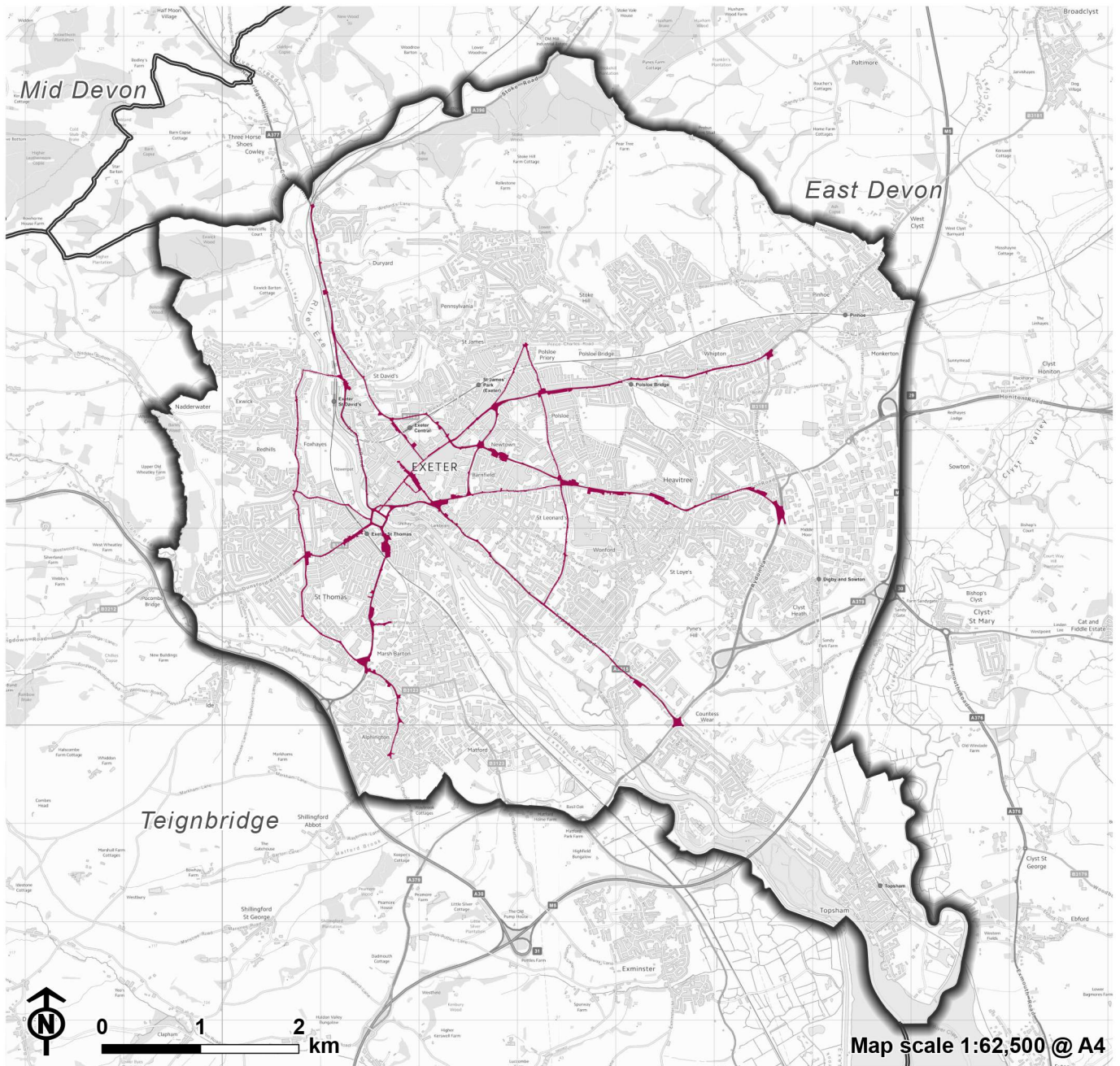
C.126 Outside of the AQMA, although air quality may be within legal limits, there is still concern present in relation to air quality, particularly in urban areas as a result of road congestion.

Exeter Plan Sustainability Appraisal Report

Exeter City Council



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Figure C.10: Air Quality Management Area

-  Exeter City boundary
-  Neighbouring authority
-  Air Quality Management Area

Noise Pollution

C.127 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.128 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.129 Light pollution is essentially unwanted artificial light and comes in the following forms:

- 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.130 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.131 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 [\[See reference 103\]](#).

C.132 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.133 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.134 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. 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.135 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.136 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 [\[See reference 104\]](#).

C.137 The Devon Local Aggregate Assessment conducted between 2020 and 2021 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 second consecutive year. The landbank for crushed rock remains above the minimum levels required by the NPPF. However, the landbank for sand and gravel has fallen below the 7-year minimum requirement. Sales of secondary aggregates increased by 14% in 2021 from 2020. Sales of marine and recycled aggregates in 2021 dropped from 2020 [\[See reference 105\]](#).

C.138 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.139 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.

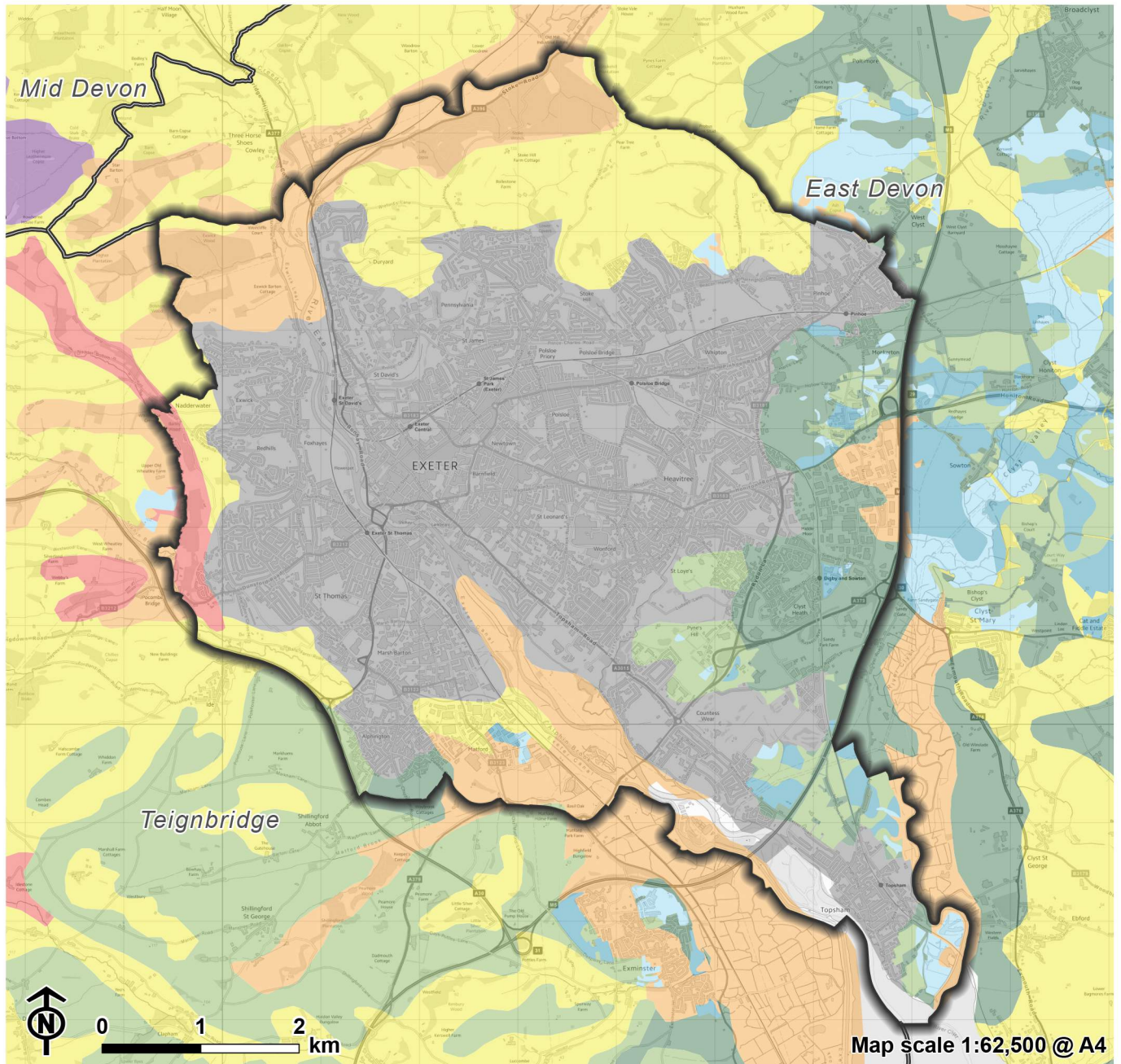
Soils

C.140 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.141 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.142 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).



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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.143 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.144 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 [\[See reference 106\]](#). 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.145 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.146 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.147 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.148 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.149 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.150 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.

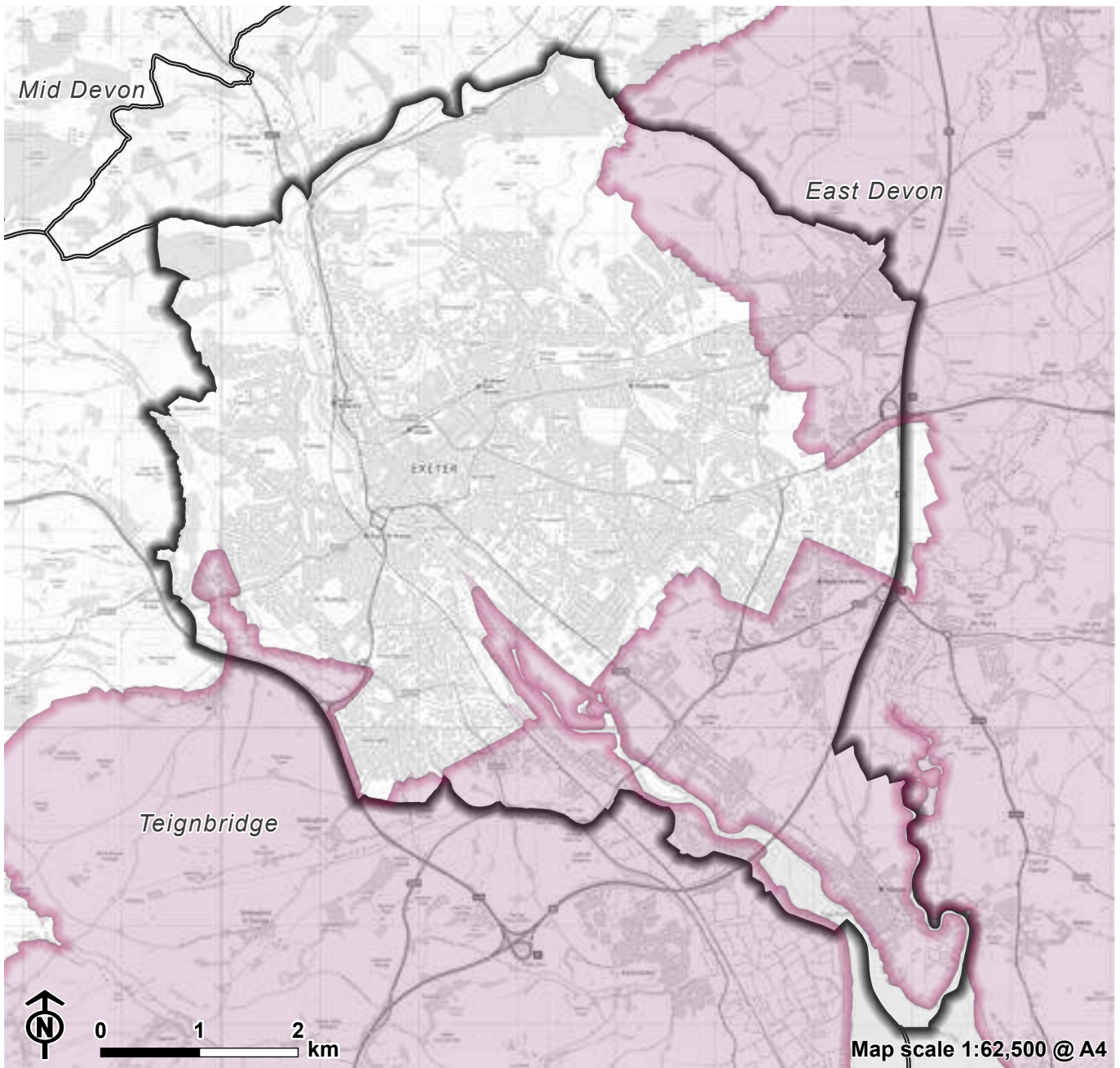
C.151 Key water bodies within and downstream of Exeter, with their current ecological status are:

- 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.152 The target for water bodies is to achieve Good Ecological Status by 2027.

C.153 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. Human health is not at risk from these sources because Southwest Water provide extra treatment.

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Figure C.12: Nitrate Vulnerable Zones

-  Exeter City boundary
-  Neighbouring authority
-  Nitrate Vulnerable Zones

Waste

C.154 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.155 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 [\[See reference 107\]](#).

C.156 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 [\[See reference 108\]](#). Household waste growth is also being held at -0.3%.

C.157 Exeter has the lowest waste arising per head (kg) in Devon at a total of 273kg per head in 2019/20, which is amongst the lowest in the Country. However, Exeter has the lowest recycling rate in Devon, with a rate of 26.1% in 2019/20 compared to East Devon at 60.1%. 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 2019/20 position of 26.1%. 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 [\[See reference 109\]](#).

Difficulties and Data Limitations

C.158 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.159 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;
- There is limited up to date biodiversity information locally, as the most recent Biodiversity Action Plan was completed in 2005;
- The majority of data available on agricultural land quality does not distinguish between Grade 3a and Grade 3b; and
- Apart from sampling point data [\[See reference 110\]](#); an up to date summary of water quality for Exeter, particularly for the River Exe, has not been found.

C.160 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 [See reference 111] found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation 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

Residential and Mixed Use 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 as they will comprise 100 dwellings or more. However the positive effects will be uncertain depending on how much of the site is used for residential development as opposed to other uses.

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

Residential Site Options

D.8 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.9 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.10 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 effect 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.11 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.

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

Residential and Mixed Use Site Options

D.12 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.13 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.14 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.

D.15 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

Residential and Mixed Use Site Options

D.16 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

Residential and Mixed Use Site Options

D.17 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.18 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.19 The delivery of residential or mixed use 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.20 The location of residential sites, as well as 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.21 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.

- 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.22 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.

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

Residential and Mixed Use Site Options

D.23 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.24 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

Residential and Mixed Use Site Options

D.25 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.26 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.
- 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

Residential and Mixed Use Site Options

D.27 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 are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites may have a significant negative (--?) effect.

- Sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or that are within 250m of a locally designated site may have a minor negative (-?) effect.
- Sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or that are over 250m from a locally designated site could have a negligible (0?) effect.

D.28 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

Residential and Mixed Use Site Options

D.29 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

Residential and Mixed Use Site Options

D.30 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. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.

- Sites that are located within 250m of a heritage asset may have a significant negative (--?) effect.
- Sites that are located between 250m-1km of a heritage asset may have a minor negative (-?) effect.
- Sites that are more than 1km from a heritage asset may have a negligible (0?) effect.

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.31 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.32 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

Residential and Mixed Use Site Options

D.33 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.

- Sites that are located mainly or entirely on brownfield land will have a significant positive (++) effect.

D.34 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: Exeter City Council's reasons for selecting or rejecting reasonable alternative 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)?	Exeter City Council's Reasons for Decision-making
2	Landing lying east of St Andrews Road	No	No	Site is at an unacceptable risk of flooding.
4	Land at Redhills (North), Exwick Lane, Exeter	No	No	Site already has planning consent for residential development.
5	Land at Lugg's Farm, Redhills (South), Exeter	No	No	Site would have an unacceptable landscape impact.
7	Merrivale Road	No	No	Availability of site not determined.
9	Flowerpot Lane Car Park, Flowerpot Lane	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
10	Okehampton Street Car Park, Okehampton Street, Exeter	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
11	Land at Ide House	No	No	Site is partially in the Barley Valley park and would have an unacceptable landscape impact.
13	Land at Taunton Close	No	No	Availability of site not determined.
17	Land at Shillingford Road, Exeter	No	No	Site is in conflict with the adopted South-West Exeter Development brief SPD which identified it as allotment space.
18	Land adjoining Silverlands, Chudleigh Road	Yes	Yes	Site comprises part of the previous south-West Exeter allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
20	Land at Bellenden, Wrefords Lane, Exeter	No	No	Site is within the Duryard and Belvidere Valley Park and would have an unacceptable landscape impact.
21	Land between Lower Argyll Road and Belvedere Road	No	No	Site lacks suitable highway access, is within the Duryard and Belvidere Valley Park and would have an unacceptable landscape impact.
23	Land to the rear of 43 St Davids Hill, Exeter	No	No	Site is unsuitable due to steep topography and unsuitable highways access.
24	99 Howell Road, Exeter	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
25	Bystock Terrace Car Park, Queens Terrace, Exeter	No	No	Site is unsuitable due to poor access and it would have an unacceptable impact on the conservation area.
26	Land at Exeter Squash Club, Prince of Wales Road	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
27	Wynford Road	No	No	Availability of site not determined.
30	Beacon Lane Garages	No	No	Availability of site not determined.

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)?	Exeter City Council's Reasons for Decision-making
31	Lancelot Road	No	No	Availability of site not determined.
33	Land off Spruce Close, Exeter	No	No	Site already has planning consent for residential development.
36	Woolsgrove, Church Hill	No	No	Site would have an unacceptable landscape impact
37	Land at Home Farm	No	No	Site would have an unacceptable landscape impact.
41	Land between St Annes Well Brewery and Exeter College, Lower North Street, Exeter	No	No	Site comprises a conversion that can come forward through a planning application rather than an allocation.
43	Mary Arches Multi-Storey Car Park, Mary Arches Street, Exeter	No	No	Site is included as part of the wider North Gate allocation ref 42.
44	Mecca Bingo, 12 North Street, Exeter	No	No	Site is not suitable for conversion to housing due to being grade II listed and lack of fenestration.
45	Smythen Street Car Park, Smythen Street, Exeter	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
47	Cathedral and Quay Car Park, Lower Coombe Street, Exeter	No	No	Site is included as part of the wider South Gate allocation ref 46.
48	Magdalen Street Car Park, Exeter, Devon	No	No	Site is included as part of the wider South Gate allocation ref 46.
49	Land at New North Road, Exeter	No	No	Unsuitable due to impact on conservation area and historic park and garden.
50	Howell Road Car Park, Howell Road, Exeter	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
51	12-31 Sidwell Street, Exeter	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
54	Triangle Car Park, Russell Street, Exeter	No	No	Site is included as part of the wider East Gate allocation ref 52.
55	Pyramids Leisure Centre, Heavitree Road, Exeter	No	No	Site is included as part of the wider East Gate allocation ref 52.
56	Parr Street Car Park, Parr Street, Exeter	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
58	Fairbanks, 90 Polsloe Road, Exeter	No	No	Site would result in the unacceptable loss of a community facility.
60	Land at Hamlin Lane, Exeter	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
61	Land between 106 Hamlin Gardens and 65 Carlyon Gardens	No	No	Site already has planning consent for residential development.
63	Clifford Close, Exeter	No	No	Availability of site not determined.
66	Land at Cumberland Way, Exeter	No	No	Site already has planning consent for residential development.

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)?	Exeter City Council's Reasons for Decision-making
67	Grenadier Emperor, Grenadier Road	No	No	Site is in conflict with the adopted Monkerton Hill Barton masterplan including the proposed Monkerton Ridge Park.
68	Grenadier Land 29, Grenadier Road	No	No	Site would conflict with the adopted Monkerton Hill Barton masterplan which identifies the site for predominantly employment development.
69	Magdalen Street Car Park, Magdalen Street, Exeter	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
70	Land known as Mount Radford Lawn	No	No	Site is unsuitable as it is an open space and would have an unacceptable impact on the conservation area.
71	Gordons Place Car Park, Gordons Place	No	No	Deliverability of site subject to the production of a Car Parking study in the future.
72	Belle Isle Depot, Belle Isle Drive, Exeter	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
73	91-97 Wonford Street	No	No	Availability of site not determined.
75	Chestnut Avenue	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
76	Bishop Westall Road	No	No	Availability of site not determined.
77	Land off Ringswell Avenue	No	No	Site would have an unacceptable impact on ecology and would comprise a loss of open space.
79	Park and Ride Site, Digby Drive	No	No	Site would result in the loss of a key park and ride facility.
80	Former overflow car park Tesco Store, Russell Way	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
81	Land adjacent Tesco Store, Russell Way, Exeter	No	No	Site is not suitable due to presence of protected trees and steep topography.
82	Russell Way, Exeter	No	No	Site is not suitable due to poor highways access, it being set on steeply sloping land and existing tree cover.
84	Garages at Lower Wear Road	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
85	Land to the east side of Glasshouse Lane, Exeter	No	No	Availability of site not determined.
86	Wear Barton Playing Fields, Wear Barton Road, Exeter	No	No	Site is unsuitable due to the loss of playing pitches and open space.
91	Land at Newcourt Road, Topsham	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
92	Land east of Newcourt Road, Topsham	Yes	No	Site is suitable, available and achievable and in accordance with the development strategy.
93	Yeomans Gardens, Newcourt Road, Topsham	Yes	No	Site is suitable, available and achievable and in accordance with the development strategy.
94	Land west of Newcourt Road, Topsham	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
95	Land at Topsham Golf Academy	No	No	Site is unsuitable due to the loss of a sports facility.

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)?	Exeter City Council's Reasons for Decision-making
96	Land at Clyst Road, Topsham	No	No	Site would have an unacceptable landscape impact.
98	Land on the south side of Monmouth Street, Topsham	No	No	Site would have an unacceptable landscape impact.
99	Mount Howe Field Topsham	No	No	Site is unsuitable due to unacceptable landscape impact and flood risk.
100	Fever & Boutique, 12 Mary Arches Street, Exeter	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
101	182-184, 185-186 Fore Street and 3-6 North Street, Exeter	No	No	Site already has planning consent for residential development.
103	Clarendon House, Western Way, Exeter	No	No	Site is included as part of the wider East Gate allocation ref 52.
105	Honeylands, Pinhoe Road	No	No	Site already has planning consent for an older persons care home.
106	Land lying east of Pinn Lane, Exeter	Yes	Yes	Site comprises a previous allocation in the core strategy. Site is suitable, available and achievable and in accordance with the development strategy.
107	Land south of Gypsy Hill Lane, Exeter	No	No	Site is in conflict with the adopted Monkerton Hill Barton masterplan including the proposed Monkerton Ridge Park.
108	Hessary, Hollow Lane, Exeter	No	No	Site is in conflict with the adopted Monkerton Hill Barton masterplan including the proposed Monkerton Ridge Park.
110	88 Honiton Road, Exeter	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
112	DOA & Exeter Mobility Centre, Wonford Road	No	No	Site is currently being used as an NHS parking facility and there is a current application being considered for this use.
114	Corner of Retreat Drive and Exeter Road, Topsham	No	No	Site already has planning consent for residential development.
115	Land at Retreat Drive, Topsham	No	No	Site already has a residential planning application with a resolution to approve consent.
118	Links House, 156 Grace Road Central, Marsh Barton, Exeter	No	No	Site is included as part of the wider Marsh Barton allocation ref 14.
119	Falcon House, Falcon Road, Exeter	No	No	Site is included as part of the wider Sandy Gate allocation ref 89.
120	22 Marsh Green Road, Exeter	No	No	Site is included as part of the wider Marsh Barton allocation ref 14.
122	1-9 Alpin Brook Road, Exeter	No	No	Site is included as part of the wider Marsh Barton allocation ref 14.
123	CP Arts, Alphin Brook Road, Marsh Barton Trading Estate, Exeter	No	No	Site is included as part of the wider Marsh Barton allocation ref 14.
124	1-5 Elm Units, Grace Road South, Marsh Barton Trading Estate, Exeter	No	No	Site is included as part of the wider Marsh Barton allocation ref 14.

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)?	Exeter City Council's Reasons for Decision-making
125	Land behind 66 Chudleigh Road, Exeter	Yes	Yes	Site comprises part of the previous south-west Exeter allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
127	Knowle Hill, Dawlish Road, Exeter	n/a	No	Site would have an unacceptable landscape impact.
129	Newbery Car Breakers, Exeter	n/a	No	Site would have an unacceptable impact on highways safety.
132	Larkbeare House, Larkbeare Road, Exeter	n/a	No	Due to its sensitivity, the site would only likely be suitable for conversion, which does not require an allocation.
133	Matford Huts, Exeter	n/a	No	Planning permission has recently be granted for the demolition of the buildings and the return of the site to grass. Site may have potential but there is a current lack of clarity regarding potential to have an adverse impact on the setting of the adjacent listed buildings.
144	Toby Carvery & Innkeeper's Collection, Exeter	n/a	Yes	Site is suitable and in accordance with the development strategy.

Table E.2: Exeter City Council's reasons for selecting or rejecting reasonable alternative 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)?	Exeter City Council's Reasons for Decision-making
1	Hamlyns Farmhouse & Hamlyns Farm, St Andrews Road	No	No	Site lacks suitable highway access and would have an unacceptable landscape impact.
6	Land on the west side of Barley Lane, Exeter	No	No	Site is partially in the Barley Valley park and would have an unacceptable landscape impact.
12	Oaklands Riding School and The Rosary, Balls Farm Road, Exeter	No	No	Site is at an unacceptable risk of flooding, would have an unacceptable landscape impact and would have an unacceptable impact the conservation area.
14	Marsh Barton	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
15	Water Lane	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
16	Haven Banks Retail Park, Water Lane, Exeter	No	No	Site is included as part of the wider Water Lane allocation ref 15.
22	Red Cow/St Davids	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
28	Land north of Exeter	No	No	Site is within the Mincinglake Valley Park, has unsuitable highways access and would have an 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)?	Exeter City Council's Reasons for Decision-making
29	Land at Pendragon Road, Exeter	No	No	Site is within the Mincinglake Valley Park and would have an unacceptable landscape impact.
34	Gray's Barn, Church Hill, Exeter	No	No	Site is within the Pin Brook Valley Park, has unsuitable highways access, is steeply sloped, isolated from services and facilities and would have an unacceptable landscape impact.
39	West Gate	Yes	No	Area to the north of the Exe has achievability issues related to viability and practicality. Riverside Leisure Centre is not suitable for redevelopment. Area around Exe Bridges Retail Park is suitable, and in accordance with the development strategy.
40	Exbridge House, 26 Commercial Rd, Exeter	No	No	Redevelopment of the site for residential use would result in a loss of high quality employment land.
42	North Gate	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
46	South Gate	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
52	East Gate	Yes	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
53	City Point	No	No	Site is included as part of the wider East Gate allocation ref 52.
64	Whipton Community Hospital, Hospital Lane, Exeter	No	No	Unsuitable due to being an existing hospital.
83	Land at St Bridget Nurseries, Old Rydon Lane	Yes	No	Site now has planning consent for residential development.
88	Land at Seabrook Farm, Topsham	No	No	Site already has planning consent for residential development.
89	Sandy Gate	Yes	No	The area to the north has achievability issues related to relocation of the motorway services, loss of employment and park and ride facilities which would inhibit achievability. The land around Old Rydon Lane is suitable, available and achievable and in accordance with the development strategy.
90	Land at Sandy Park	No	Yes	Site comprises a previous allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
97	Land to the east of Clyst Road, Topsham	No	No	Site would have an unacceptable landscape impact.
102	Civic Centre, Paris Street	No	No	Site is included as part of the wider East Gate allocation ref 52.
104	Former Police Station and Central Devon Magistrates' Court, The Court House, Heavitree Road, Exeter	No	No	Site is included as part of the wider East Gate allocation ref 52.
109	Land to the north, south and west of the Met Office, Hill Barton, Exeter	Yes	No	Site comprises a previous allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
111	Sowton Park and Ride, Sidmouth Road	No	No	Site is included as part of the wider Sandy Gate allocation ref 89 although may need to be retained as a park and ride facility.

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)?	Exeter City Council's Reasons for Decision-making
113	Land south of the A379, Exeter	Yes	No	Site now has planning consent for residential development.
116	Land at Water Lane	No	No	Site is included as part of the wider Water Lane allocation ref 15.
117	Isca House, Haven Road, Exeter	No	No	Site is included as part of the wider Water Lane allocation ref 15.
121	RGB Exeter, Alphinbrook Road, Marsh Barton, Exeter	No	No	Site is included as part of the wider Marsh Barton allocation ref 14.
126	Aldens Farm West, Alphington	No	No	Site already has planning consent for residential development.
128	Land west of Barley Lane (2), Exeter	n/a	No	Site is partially in the Barley Valley park and would have an unacceptable landscape impact.
130	Vulcan Works, Water Lane, Exeter	n/a	No	Site is included as part of the wider Water Lane allocation ref 15.
131	Exbridge House, 26 Commercial Road (2), Exeter	n/a	No	Site would result in a loss of high quality employment land.
134	Land north of Exeter/Land at Stoke Hill (2), Exeter	n/a	No	Site would have an unacceptable landscape impact.
135	Motorway Services, Sowton	n/a	No	Site has achievability issues related to the difficulty of relocating the motorway service station.
136	Land adjacent Ikea, Newcourt	n/a	Yes	Site comprises a previous allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
138	Land east of Clyst Road, Topsham (2)	n/a	No	Site would have an unacceptable landscape impact.
139	Residual Land at Newcourt	n/a	No	Site is included as part of the wider Land at Old Rydon Lane allocation ref 90.
140	Land north of Old Rydon Lane, Exeter	n/a	Yes	Site comprises a previous allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
141	St Luke's Campus, Heavitree Road, Exeter	n/a	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
142	Exe Bridges Retail Park	n/a	Yes	Site is suitable and in accordance with the development strategy.
143	Land at Cowley Bridge Road, Exeter	n/a	Yes	Site is suitable, available and achievable and in accordance with the development strategy.

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- 14 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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- 25 Please note that the Council took the approach in the SA Scoping Report (2020) of excluding plans and policies above the national level given that the objectives of these are translated into national policy, principally through the NPPF. For completeness this report includes details of plans and policies of most relevance at the international level.
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