

Exeter City Council

Exeter Plan: Outline Draft Plan Consultation Sustainability Appraisal Report

Final report

Prepared by LUC
September 2022



Exeter City Council

**Exeter Plan: Outline Draft Plan Consultation
Sustainability Appraisal Report**

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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 Outline Draft Plan (August 2022) 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 130,800¹ and is at the heart of a travel to work area of over 470,000 residents². 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.

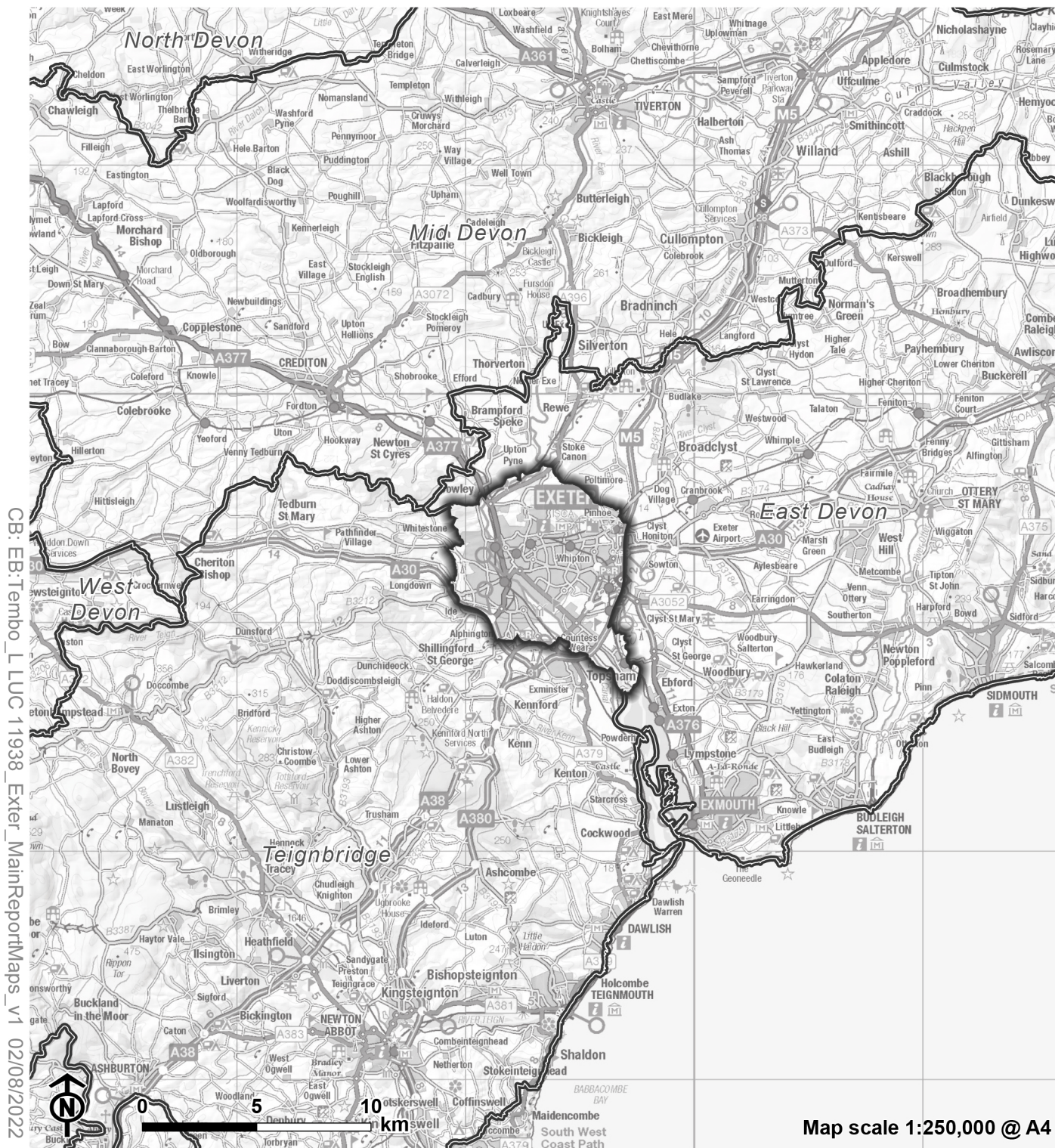
1.3 Exeter is a vibrant city with a young demographic. It has a compact centre with many places to shop, an impressive programme of events and a leisure offer that bring its public spaces to life, with an average city centre footfall of 1,364,000 people per month (pre-Covid)³. It is also a Fairtrade 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

¹ 2021 Census population estimates

² [Exeter City Council \(2019\) Exeter economy in numbers \[online\]](#)

³ [Exeter City Council \(2019\) Exeter economy in numbers \[online\]](#)

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 consultation⁴ explained what Exeter City Council believes are the main issues for the city. The consultation did not include any options or draft policies at this stage. Responses to the consultation have been used to inform preparation of the current Outline Draft Plan (August 2022) which this SA report relates to.

Outline of the Exeter Plan: Outline Draft Plan

1.6 The current Outline Draft Plan document sets out 11 overarching objectives which will support the delivery of the Vision set out in the separate Exeter City Council 2040 Vision Statement. There are 28 policies within the Outline Draft Plan, which is structured as follows:

- Objectives
- Strategy
 - Policy S1: Spatial Strategy
 - Policy S2: Liveable Exeter Principles
- Climate Emergency
 - Policy CE1: Net zero Exeter
 - Policy CE2: Local energy networks
 - Policy CE3: Flood risk
- Homes
 - Policy H1: Housing requirements
 - Policy H2: Housing allocations
- 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

- The Future of our High Streets
 - Policy HS1: The role of our high streets
- Sustainable Transport and Communications
 - Policy STC1: Sustainable movement
 - Policy STC2: Active and sustainable travel in new developments
 - Policy STC3: Active travel proposals
 - Policy STC4: Public transport proposals
 - Policy STC5: Digital communications
- Natural Environment
 - Policy NE1: Landscape setting areas
 - Policy NE2: Valley Parks
 - Policy NE3: Biodiversity
 - Policy NE4: Green infrastructure
- History and Heritage
 - Policy HH1: Conserving and enhancing heritage assets
- Culture
 - Policy C1: Protecting and enhancing cultural and tourism facilities
- High Quality Places and Design
 - D1: Design principles
- Health and Wellbeing
 - Policy H1: Health and wellbeing
- Infrastructure and Community Facilities
 - Policy IC1: Delivery of infrastructure
 - Policy IC2: Community facilities
 - Policy IC3: Viability

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)⁵. The SEA Regulations remain in force post-Brexit and it is a legal

⁴ [Exeter City Council \(2021\) New Exeter Local Plan – Issues Consultation \[online\]](#)

⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The

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

1.8 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)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'.

1.9 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. 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.

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

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

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

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

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

Meeting the Requirements of the SEA Regulations

1.11 **Table 1.1** below signposts the relevant sections of this SA Report that are considered to meet the SEA Regulations requirements. This table 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.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations Requirements	Covered in this Report?
Environmental Report	
<p>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:</p> <ul style="list-style-type: none"> ■ Implementing the plan or programme; and ■ Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. <p>Regulation 12(1) and (2) and Schedule 2</p>	<p>This SA Report which has been produced to accompany consultation on the Outline Draft Plan constitutes the 'environmental report'.</p>
<p>An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans and programmes.</p>	<p>Chapter 1, Chapter 3, Appendix B and Appendix C</p>

Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).

⁶ [Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government \(2015, updated 2020\). Strategic environmental assessment and sustainability appraisal](#)

SEA Regulations Requirements	Covered in this Report?
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.	
<p>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:</p> <ul style="list-style-type: none"> ■ 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). 	Chapter 4, Chapter 5 and Chapter 6
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.	Chapter 4, Chapter 5 and Chapter 6
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.	Chapter 2
A description of the measures envisaged concerning monitoring in accordance with Regulation 17.	Chapter 7
A non-technical summary of the information is provided under paragraphs 1 to 9.	A separate non-technical summary document has been prepared to accompany this report.
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> ■ Current knowledge and methods of assessment; ■ The contents and level of detail in the plan or programme; 	The Environmental Report at each stage of the SA will adhere to this requirement.

SEA Regulations Requirements	Covered in this Report?
<ul style="list-style-type: none"> ■ 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. <p>Regulation 12(3)</p>	
Consultation	
<p>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.</p> <p>Regulation 12(5)</p>	<p>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.</p>
<p>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.</p> <p>Regulation 13</p>	<p>Consultation on the Outline Draft Plan document is taking place between September and November 2022. The consultation document is accompanied by this SA Report.</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country.</p> <p>Regulation 14</p>	<p>The Exeter Plan is not expected to have significant effects on other EU Member States.</p>
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
<p>Provision of information on the decision:</p> <p>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:</p> <ul style="list-style-type: none"> ■ 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. 	<p>To be addressed after the Exeter Plan is adopted.</p>
Monitoring	
<p>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.</p> <p>Regulation 17(1)</p>	<p>Chapter 7 proposes indicators for monitoring the likely significant effects of the Exeter Plan.</p>

Structure of the SA Report

1.12 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.
- **Chapter 6: Sustainability Appraisal Findings for the Outline Draft Plan** presents the SA findings for the policies in the Outline Draft Plan (August 2022) 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 Outline Draft Plan and describes the next steps to be undertaken.
- **Appendix A: Consultation Comments Received in Relation to the SA Scoping Report (March 2022)** presents a record of the consultation comments received in relation to the SA Scoping Report in March 2022 and explains how they have been addressed in this report.
- **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.

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

Chapter 2

Methodology

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

Figure 2.1: Corresponding stages in plan-making and SA



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

SA Stage A: Scoping

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

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

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

2.5 A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and sub-regional levels that were considered to be relevant to the scope of the Exeter Plan. This review was originally presented in the SA Scoping Report⁷ and has been updated as part of the preparation of this current SA report. The updated version is presented in full in **Appendix B** and is summarised in **Chapter 3**.

Collect Baseline Information to Establish Sustainability Context

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

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

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

the likely cumulative effects of the plan, which is another requirement of the SEA Regulations.

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

Identify Key Sustainability Issues

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

2.11 Key sustainability issues facing Exeter City and an analysis of their likely evolution without the Exeter Plan are detailed in **Chapter 3**. Key sustainability issues for Exeter were originally identified in the SA Scoping Report (March 2022) and a small number of amendments have been made to these in response to consultation comments received.

Develop the SA Framework

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

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

⁷ LUC (March 2022) Exeter Local Plan SA Scoping Report

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

Consult on the Scope and Level of Detail of the SA

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

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

2.17 **Appendix A** lists the comments that were received on the scope of the SA during this period of consultation and describes how each one has been addressed in the preparation of this SA report.

SA Stage B: Developing and Refining Options and Assessing Effects

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

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

“The report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

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

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

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

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

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

Strategic Options

2.23 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.

2.24 These options were originally appraised by LUC in June 2022 and the findings were provided to the Council in the form of an internal summary note, which was not made publicly available at the time but which now forms the basis for **Chapter 4** of this 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.

2.25 No reasonable alternative options for the quantum of development have been considered in the SA as the Council is proposing an evidenced-based quantum of growth, and does not consider that there are reasonable alternative options for higher or lower quanta. The evidence based

Objectively Assessed Need (OAN) is considered by the Council to be the minimum amount of housing that should be required as there is land available to meet that need, so delivering less than that amount is not reasonable in SA terms. The Council believes that a higher housing figure is also not a reasonable option due to the restrictions of the administrative area both in terms of size and constraints.

Development Site Options

2.26 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 have been 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, have been subject to SA.

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

SA Stage C: Preparing the Sustainability Appraisal Report

2.28 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 Outline 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.

2.29 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

2.30 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

Outline Draft Plan. This SA Report is being published on the Council's website at the same time as the consultation on the Outline 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

2.31 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

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

2.33 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.
+/- or ++/--	Mixed minor or significant effects likely.

Symbol and Colour Coding	Description
-	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

2.34 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

2.35 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.”

2.36 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 very 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 data⁸; 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. 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

⁸ Environment Agency (undated) Water Quality Archive: Search sampling points [online]

some spatial data required for proximity-based assessments were not available for neighbouring districts, or for part of them.

- The level of detail of the site options appraisal work was commensurate with the level of detail of the Exeter Plan document. As such, not every local characteristic could be investigated for each site option. For example, in relation to potential effects of the site options on biodiversity assets, it was necessary to base the identified effect on proximity to designated biodiversity sites only. While it is recognised that in some cases sites might be close to high value non-designated assets, the strategic nature of the SA meant that it was not possible to investigate this potential for each site option and the likely effect was based on designated sites only. This approach was considered to be the best way of ensuring consistency and a comparable level of detail in each site appraisal.
- The rate at which emissions from private vehicles will change over the course of the plan period as a result of technological improvements cannot be predicted or realistically factored into judgements about air quality and carbon emissions.
- The available GIS data for agricultural land classification did not distinguish between Grade 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land). This resulted in some uncertainty in the scores, as set out in the assumptions (see **Appendix D**).

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):

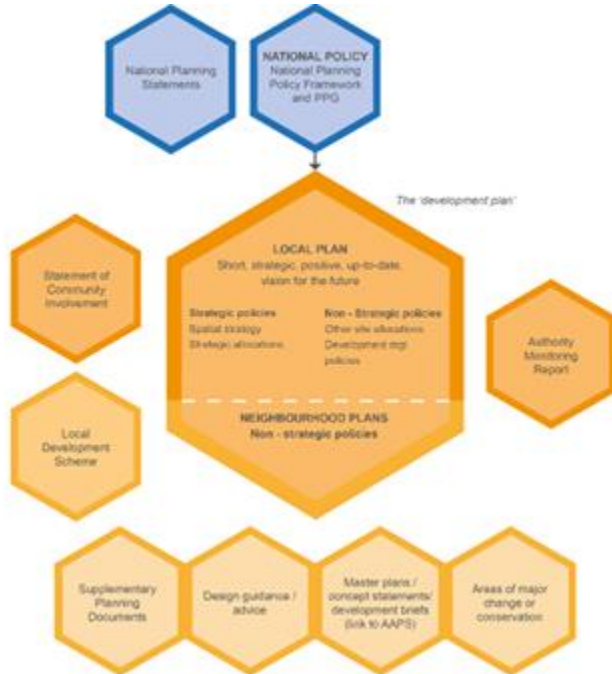
1. *“an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes”*; and
5. *“the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and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

3.2 A description of the Outline 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 between the Exeter Plan and other relevant plans or 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.

- Brexit – Following the United Kingdom’s (UK) departure from the European Union (EU) on 31st January 2020, it entered a transition period which ended on 31st December 2020. Directly applicable EU law now no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law.
- The Levelling Up and Regeneration Bill⁹ – Published on 11th May 2022 by the Department for Levelling Up, Housing and Communities (DLUHC), the Bill sets out a direction for planning and aims to support the levelling up agenda. It seeks to streamline the planning process while attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system that will replace the Community Infrastructure Levy (CIL), improve alignment between plans with a new flexible alignment test that to address cross-boundary issues, and will introduce added protection for heritage assets through the implementation of national ‘General Heritage Protection Policies’. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a ‘cleaner and simpler’ process which will be known as ‘Environmental Outcome Reports’ (EOR).

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) Regulations¹⁰ and Habitats Regulations¹¹. 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.

⁹ [Department for Levelling Up, Housing and Communities \(2022\) Levelling Up and Regeneration Bill \[online\]](#)

¹⁰ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The

Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531)

¹¹ The Conservation of Habitats and Species Regulations 2017 (SI No. 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579). TSO (The Stationery Office), London.

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 NPPF¹² 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, revised in July 2018, updated in February 2019 and again in July 2021. The most recent update 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 PPG¹³ 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*

¹² Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework

¹³ Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance

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 ahead¹⁴. 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 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 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,

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".

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:

- 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 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:

- 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)
- 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 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 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 in terms of the effect they will have 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:

- The Heritage Alliance, Heritage 2020
- Historic England, Corporate Plan 2018-2021
- 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:

- 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)
- Environment Agency, Managing Water Abstraction (2016)
- 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:

- Build Back Better: Our Plan for Growth (2021)
- UK Industrial Strategy: Building a Britain fit for the future (2018)
- HM Government, Industrial Strategy: building a Britain fit for the future (2017)
- LEP Network, LEP Network response to the Industrial Strategy Green Paper Consultation (2017)
- National Infrastructure Delivery Plan 2016-2021 (2016)
- Infrastructure and Projects Authority, 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:

- Decarbonising Transport: A Better, Greener Britain (2021)
- 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

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 in **Table 3.1**.

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 in the final column of **Table 3.1** in relation to each of the key sustainability issues.

Table 3.1: Key sustainability issues for Exeter City and their likely evolution in the absence of the Exeter Plan

Topic	Key Sustainability Issue	Likely Evolution of the Issue without the Exeter Plan
Population, Health and Wellbeing	<p>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.</p> <p>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.</p> <p>There are inequalities related to life expectancy and overall deprivation within Exeter which could be exacerbated by the COVID-19 pandemic.</p>	<p>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.</p> <p>The new Exeter Plan provides opportunity to help manage pressures on education facilities by setting clear requirements for the provision required for new development.</p>
Open Spaces and Recreation	<p>Exeter is well provided with open space but it is not well utilised and could meet the needs of the City better, 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.</p>	<p>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.</p>
Crime and Safety	<p>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.</p>	<p>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.</p>
Economy	<p>Exeter has a low business density due to a dominance of larger employers.</p> <p>Uncertainty exists over what the economic impacts of Britain's exit from the EU and the COVID-19 pandemic will be.</p>	<p>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.</p> <p>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.</p>

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Topic	Key Sustainability Issue	Likely Evolution of the Issue without the Exeter Plan
Transport	Exeter continues to see rising levels of inward commuting, with travel behaviour for commuters outside the City predominantly being by car.	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	There is a risk of Exeter's sensitive biodiversity sites being harmed by inappropriate development, increased activity and increased urbanisation impacts.	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	Poorly planned development could adversely affect some of Exeter's heritage assets.	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	The landscape setting of the City could be adversely affected by inappropriate development.	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	<p>Hotter, drier summers are expected as a result of ongoing and accelerating climate change, which have the potential for adverse effects on human health.</p> <p>High flood risk in some areas particularly around the River Exe, which is expected to increase due to climate change.</p> <p>There are continued high CO2 emissions from transport.</p>	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.

Topic	Key Sustainability Issue	Likely Evolution of the Issue without the Exeter Plan
		<p>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.</p> <p>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.</p> <p>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.</p>
<p>Natural Resources and Pollution</p>	<p>There are small areas of Grade 3 agricultural land, and small areas in the south east of Grades 1 and 2.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

The SA Framework

3.53 As described in **Chapter 2**, the relevant objectives established via the review of plans, policies, and programmes and the key sustainability issues identified by the baseline review informed the development of a framework of sustainability objectives, the SA framework, against which the plan is being assessed. The SA framework for the Exeter Plan is presented in **Table 3.2**.

3.54 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 in the second column of the table. 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.

3.55 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**.

Table 3.2: SA framework for the Exeter Plan

SA Objective	Appraisal Questions	Relevant SEA Topic(s)
<p>1: To achieve net-zero emissions and support adaptation to unavoidable climate change</p>	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Climate
<p>2: To provide a suitable supply of high quality housing including appropriate mix of types and tenures</p>	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Population ■ Human Health ■ Material Assets
<p>3: To support sustainable and diverse growth of the City's economy and maximise employment opportunities</p>	<ul style="list-style-type: none"> ■ 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 exist from the EU and the COVID-19 pandemic? ■ Will the policy/option support opportunities for the expansion and diversification of businesses? 	<ul style="list-style-type: none"> ■ Population ■ Material Assets

SA Objective	Appraisal Questions	Relevant SEA Topic(s)
4: Improve the physical health and wellbeing of residents and reduce health inequalities	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Population ■ Human Health ■ Material Assets
5: Promote high quality design in new development and improve the character of the built environment	<ul style="list-style-type: none"> ■ Will the policy/option promote visually attractive development with high quality design, layout and appropriate and effective landscaping? 	<ul style="list-style-type: none"> ■ Material Assets ■ Landscape ■ Cultural Heritage
6: To support community cohesion and safety	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Population ■ Human Health
7: To provide good access to services, facilities and education	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Population ■ Human Health ■ Material Assets
8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives	<ul style="list-style-type: none"> ■ Will the policy/option reduce reliance on private vehicles? ■ Will the policy/option improve public transport links to key facilities within the City? 	<ul style="list-style-type: none"> ■ Air ■ Climate

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SA Objective	Appraisal Questions	Relevant SEA Topic(s)
	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Population ■ Human Health
9: To protect residential amenity by reducing air, noise and light pollution	<ul style="list-style-type: none"> ■ 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)? 	<ul style="list-style-type: none"> ■ Air ■ Human Health
10: To conserve and enhance biodiversity and geodiversity	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Biodiversity ■ Human Health
11: To conserve and enhance the character and distinctiveness of the landscape	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Landscape ■ Cultural Heritage
12: To conserve and enhance the historic environment including the setting of heritage assets	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Cultural Heritage ■ Material Assets
13: To manage and reduce flood risk from all sources and to protect the	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ Water ■ Biodiversity

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SA Objective	Appraisal Questions	Relevant SEA Topic(s)
quality and quantity of water resources	<ul style="list-style-type: none"> ■ 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? 	
14: To support efficient use of resources, including land, minerals and waste	<ul style="list-style-type: none"> ■ 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? 	<ul style="list-style-type: none"> ■ 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 use of 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, minor 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. 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. Options A, B and C are considered to have significant 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, and 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. In all cases, the effects identified are uncertain as they will be dependent on the exact location of new development and the proposals for how any residual flood risk is managed, for example the incorporation of SuDS within new developments.

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

Table 4.1: Summary of SA findings for the Strategic Options

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

Chapter 5

Sustainability Appraisal

Findings for the Site Options

5.1 This chapter summarises the SA findings for the reasonable alternative development site options that are being considered for allocation in the Exeter Plan. A total of 82 residential sites and 31 mixed use sites have been appraised.

5.2 The likely effects of each site option are presented in **Table 5.1** for Residential sites and **Table 5.2** for Mixed Use sites, and justification for the identified effects is summarised by each SA Objective below.

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

5.3 SA Objective 1 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 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

5.4 Minor positive effects are expected for all 82 of the 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.

5.5 All of the 31 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

5.6 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.

5.7 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, seven mixed use site options (Site ID: 14, 52, 53, 89, 102, 113 and 121) 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

5.8 All residential sites options are expected to have positive effects on SA Objective 4, with 48 having significant positive effects as they would either provide more than 1,000 homes or are within 730m of a healthcare facility and an area of open space/sports facility. 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, 14 of the residential sites and 12 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

5.9 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

5.10 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, 11 residential and 10 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

5.11 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 to the west of the River Exe and towards the eastern limits 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 18 of the

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

5.12 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. Eight of the residential site options and five 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

5.13 All of the residential and mixed use site options are expected to score positively against SA Objective 8, with only eight residential sites and one mixed use site expected to have minor positive effects and the remaining sites expected to have significant positive effects, as the majority of sites are within 1.8km of a railway station and 450m 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. 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

5.14 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 six residential site options are expected to have significant negative effects, as 30 are within 100m of the AQMA and six sites are adjacent to the M5. Similarly, 14 mixed use site options are expected to have significant negative effects as 12 are within 100m of the AQMA and two 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

5.15 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. Thirty seven of the residential sites and 23 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.

5.16 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.

5.17 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

5.18 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. Thirteen residential and 11 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

5.19 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

5.20 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.

5.21 None of the residential or mixed use sites 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

5.22 The majority of land within Exeter City is classed as in urban use. However, 10 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 six 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, 43 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.

5.23 Nineteen mixed use sites are expected to have significant positive effects as they are located on brownfield land. A further 14 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.

5.24 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

5.25 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. Four residential site options and 11 mixed use site options are expected to have significant negative effects across five or more SA Objectives (Residential Sites, Site ID: 2,, 55, 68 and 112 and Mixed Use Sites, Site ID: 12, 14, 15, 28, 34, 39, 52, 88, 89, 90, 97). If any of these site options are taken forward in the Exeter Plan, particular consideration should be given to mitigation. Of these sites, four mixed site options (Site ID: 88, 89, 90 and 97) 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: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
2	Landing lying east of St Andrews Road	0	+	0	++	0	0	+/-?	++	--/0	--?	--?	--?	--/0	-/0
4	Land at Redhills (North), Exwick Lane, Exeter	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
33	Land off Spruce Close, Exeter	0	+	0	+	0	0	+/+?	++	0	--?	--?	-?	-/0	--?/0
36	Woolsgrove, Church Hill	0	+	0	++	0	0	+/+?	++	0	0?	--?	--?	0	--?/0
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

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
48	Magdalen Street Car Park, Exeter, Devon	0	+	0	++	0	+	+/-?	++	--/0	-?	0?	--?	0	++/0
47	Cathedral and Quay Car Park, Lower Coombe Street, Exeter	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
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
67	Grenadier Emperor, Grenadier Road	0	+	0	++	0	0	+++?/-	++	0	--?	0?	--?	--/0	--0
68	Grenadier Emperor, Grenadier Road	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
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
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

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
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/
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
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
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

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
122	1-9 Alpin Brook Road, Exeter	0	+	--?/0	++	0	0	-/+?	++	0	--?	0?	--?	--/0	++/0
123	CP Arts, Alpin 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
125	Land behind 66 Chudleigh Road, Exeter	0	+	0	++	0	0	-/-?	+	--/0	0?	0?	--?	--/0	--/0

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

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built 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
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?	--?	--/--?	++/-?
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
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
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	++/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
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

Site ID	Site Name	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Water	SA14: Resources
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
116	Land at Water Lane	0	++?	+/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

Chapter 6

Sustainability Appraisal Findings for the Outline Draft Plan

6.1 This chapter sets out the assessments of the policies included in the Outline 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 emerging Plan at the end of this chapter.

6.3 A number of recommendations were made in a draft version of this report, which have now been considered by the Council. These are set out at the end of the chapter along with the Council's response.

Objectives

6.4 This section presents the appraisal of the objectives set out in the Outline Draft Plan.

6.5 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 net zero Exeter by 2030.
- 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 priority of delivering net zero Exeter by 2030 and building great neighbourhoods.
- 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 priorities of promoting active and healthy lifestyles and building great neighbourhoods.

- 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 net zero Exeter by 2030, building great neighbourhoods and promoting active and healthy lifestyles.
- 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 net zero Exeter by 2030, promote active and healthy lifestyles and building great neighbourhoods.
- 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 building great neighbourhoods.
- 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 Exeter by 2030, promoting active and healthy lifestyles and building great neighbourhoods.
- 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 net zero Exeter by 2030, promoting active and healthy lifestyles and building great neighbourhoods.
- 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 net zero Exeter by 2030, promoting active and healthy lifestyles and building great neighbourhoods.

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

Table 6.1: Summary of SA findings for the Objectives

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

6.7 The first objective of the Exeter Plan states that the Plan will make the fullest possible contribution to the mitigation of, and adaptation 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

6.8 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

6.9 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 Exeter by 2030, and therefore a minor positive effect is also expected in relation to **SA Objective 1: Climate Change**.

The Future of our High Streets

6.10 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

6.11 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

6.12 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

6.13 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

6.14 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

6.15 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 by 2030 and therefore a minor positive effect is also expected against **SA Objective 1: Climate Change**.

Health and Wellbeing

6.16 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 by 2030.

Infrastructure and Community Facilities

6.17 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 by 2030. 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.

6.18 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.

6.19 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

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

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

6.21 In terms of reasonable alternatives, the likely effects of the alternative options to Policy S1 were appraised and the findings presented in **Chapter 4**. No reasonable alternative options have been identified in relation to Policy S2.

6.22 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.

6.23 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 SP1	Policy SP2
SA1: Climate Change	+/-?	+
SA2: Housing	++	+
SA3: Economic Growth	++	+
SA4: Health	+	++
SA5: Design and the Built Environment	+	++
SA6: Community	+	++
SA7: Services, Facilities and Education	+	+
SA8: Sustainable Travel	++	+
SA9: Pollution	+/-?	+
SA10: Biodiversity and Geodiversity	-?	+/-?
SA11: Landscape	-?	+/-?
SA12: Cultural Heritage	-?	+/-?
SA13: Water	-?	+/-?
SA14: Resources	+/-?	+/-?

Policy S1: Spatial Strategy

6.24 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.

6.25 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 positive effects on **SA Objective 2: Housing** and **SA Objective 3: Economic Growth**, as it is 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. Significant positive effects are therefore likely on SA objectives 2 and 3.

6.26 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 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**.

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

6.28 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 encouraging the use of sustainable modes due to the proximity and access of likely development locations within the City, and because 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**.

6.29 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. 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. 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.

6.30 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.

6.31 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

6.32 The likely effects of Policy S2 are broadly very positive, as the policy seeks to ensure that new large-scale 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.

6.33 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 by 2030.

6.34 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.

6.35 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 large-scale 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 large-scale 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.

Climate Emergency

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

- Policy CE1: Net zero Exeter
- Policy CE2: Local energy networks
- Policy CE3: Flood risk

6.37 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 Emergency Policies

SA Objectives	Policy CE1	Policy CE2	Policy CE3
SA1: Climate Change	++	++	+
SA2: Housing	0	0	0
SA3: Economic Growth	+	+	0
SA4: Health	+	0	+
SA5: Design and the Built Environment	+	0	0
SA6: Community	0	0	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

SA Objectives	Policy CE1	Policy CE2	Policy CE3
SA12: Cultural Heritage	+?	0	0
SA13: Water	+	0	++
SA14: Resources	0	0	0

Policy CE1: Net zero Exeter

6.38 Policy CE1: 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.

6.39 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.

6.40 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**.

6.41 Policy CE1 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**.

6.42 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. A minor positive effect is also expected in relation to **SA Objective 13: Water** because the policy seeks to make use of SuDS and any other suitable approaches to flood risk management.

6.43 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.44 There are two reasonable alternatives to Policy CE1: 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 – The Government has committed to introduce a new 'Future Buildings Standard' in 2025 and the interim uplift to the Building Regulations comes into effect on 15 June 2022. A more detailed policy could go beyond standards set out in buildings regulations although the status of such a policy approach is not yet clear.

6.45 The likely effects of these two reasonable alternative options are summarised below.

6.46 As was the case with Policy CE1, 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.

6.47 Reasonable Alternative 2 also seeks to achieve net zero carbon but would be more detailed than Policy CE1 and set out the new Future Buildings Standard. This would contribute more to **SA Objective 1: Climate Change** and reinforce the likely significant positive effect. As was the case with Policy

CE1, minor positive effects would be expected in relation to **SA Objective 3: Economic Growth, SA Objective 4: Health, SA Objective 5: Design and the Built Environment, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape and SA Objective 13: Water.** Potential but uncertain minor positive effects would be expected in relation to **SA Objective 7: Services, Facilities and Education and SA Objective 12: Cultural Heritage.**

6.48 Negligible effects are expected against the remaining SA objectives.

Policy CE2: Local energy networks

6.49 Policy CE2: 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.

6.50 A minor positive effect is expected in relation **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.

6.51 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.52 There are two reasonable alternatives to Policy CE2: 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.

6.53 The likely effects of these two reasonable alternative options are described below.

6.54 Reasonable Alternative 1, like Policy CE2, 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.

6.55 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.

6.56 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 the local energy networks, the local energy networks may not be delivered if the location is considered unsuitable. Negligible effects are expected against the remaining SA objectives.

Policy CE3: Flood risk

6.57 Policy CE3: 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 meets 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.**

6.58 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.59 One reasonable alternative has been considered by the Council in relation to Policy CE3: 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.

6.60 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.

Homes

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

- Policy H1: Housing requirements
- Policy H2: Housing allocations

6.62 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
SA1: Climate Change	0	0
SA2: Housing	++	++
SA3: Economic Growth	+	--?/+
SA4: Health	0	++/--?
SA5: Design and the Built Environment	0	0
SA6: Community	0	+
SA7: Services, Facilities and Education	0	+?/-?
SA8: Sustainable Travel	0	++
SA9: Pollution	0	--
SA10: Biodiversity and Geodiversity	-?	--?
SA11: Landscape	-?	-?
SA12: Cultural Heritage	-?	--?
SA13: Water	-?	--
SA14: Resources	-?	++/--

Policy H1: Housing requirements

6.63 Policy H1: Housing requirements makes provision for 14,300 new homes over the Plan period, which equates to 650 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.

6.64 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.65 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 650 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 650 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: Do not include any headroom in the policy or include a headroom lower than 10% – 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 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.**
- Reasonable Alternative 3: Include a headroom greater than 10% – A headroom greater than 10% is not considered to be necessary at this stage.

6.66 Reasonable Alternative 3 would incorporate a headroom greater than 10%, above that required by the NPPF. This has the potential to ensure more homes are delivered, as there would be greater flexibility in terms of delivery. Therefore, a significant positive effect is expected in relation to **SA Objective 2: Housing**. As with Policy H1, a minor positive effect is also expected in relation to **SA Objective 3: Economic Growth** and the option could have minor negative effects on the environmental SA objectives 10-14, although these effects are uncertain.

Policy H2: Housing allocations

6.67 Policy H2: Housing allocations is expected to have a significant positive effect in relation to **SA Objective 2: Housing** because it allocates 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.

6.68 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.

6.69 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.

6.70 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. Appropriate mitigation may also help avoid adverse effects and even result in beneficial effects. Overall, therefore, the effect is recorded as uncertain.

6.71 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.

6.72 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 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.

6.73 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.

6.74 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.

6.75 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.

6.76 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.

6.77 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.

6.78 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

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

Economy and Jobs

6.80 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

6.81 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
SA1: Climate Change	0	0	0	0
SA2: Housing	0	0	0	0
SA3: Economic Growth	++	+	++	++
SA4: Health	0	0	0	0
SA5: Design and the Built Environment	0	0	0	0
SA6: Community	0	0	0	0

SA Objectives	Policy EJ1	Policy EJ2	Policy EJ3	Policy EJ4
SA7: Services, Facilities and Education	+	0	0	+
SA8: Sustainable Travel	0	0	+	0
SA9: Pollution	0	+	+	0
SA10: Biodiversity and Geodiversity	0	0	0	0
SA11: Landscape	0	0	0	0
SA12: Cultural Heritage	0	0	0	0
SA13: Water	0	0	0	0
SA14: Resources	0	++	0	0

Policy EJ1: Economic growth in the transformational sectors

6.82 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 and other emerging transformational sectors. According to the policy, Exeter is committed to becoming one of the UK's leading knowledge economies.

6.83 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.

6.84 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.85 One reasonable alternative to Policy EJ1: Economic growth in the transformational sectors has been considered:

- Reasonable Alternative 1: Policy to allocate sites – It would be difficult to allocate specific sites for these types of business as they come within the wide ranging use class E: Commercial, Business and Service. However, suitable sites and premises are likely to come forward through the established employment areas and large scale development proposals and therefore specific allocations are unlikely to be required.

6.86 Allocating specific sites for the transformational sectors enables an appraisal to be undertaken of the physical constraints of these sites. However, Reasonable Alternative 1

does not specify the location of these sites. Overall, therefore, a significant positive effect is expected in relation to **SA Objective 3: Economic Growth** and uncertain effects are identified in relation to **SA Objective 4: Health, SA Objective 8: Sustainable Travel, SA Objective 9: Pollution, SA Objective 10: Biodiversity and Geodiversity, SA Objective 11: Landscape, SA Objective 12: Cultural Heritage, SA Objective 13: Water** and **SA Objective 14: Resources**. Negligible effects are expected in relation to the remaining SA objectives.

Policy EJ2: Retention of employment land

6.87 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.

6.88 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.

6.89 Negligible effects are expected against the remaining objectives.

Reasonable Alternatives

6.90 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.

6.91 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.

6.92 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

6.93 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 units.

6.94 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

6.95 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 reasonable, particularly for small-scale developments, and could impact on viability.

6.96 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.

6.97 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

6.98 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.

6.99 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

6.100 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 reasonable, particularly for small scale development, and could impact on viability.

6.101 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.

6.102 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.

The Future of High Streets

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

- Policy HS1: The role of our high streets

6.104 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 High Streets Policy

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

Policy HS1: The role of our high streets

6.105 Policy HS1: The role of our high streets 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 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. 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**.

6.106 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. A minor positive effect is also expected against **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.

6.107 A minor positive effect is likely in relation to **SA Objective 2: Housing** because reference is made in the policy to residential uses and therefore this policy will support the delivery of new homes.

6.108 Lastly, a minor positive effect is expected against **SA Objective 14: Resources** because it is likely that this policy will promote the use of previously developed land within the city centre and district and local centres, limiting development outside of these built-up areas and on high quality agricultural land.

Reasonable Alternatives

6.109 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.

6.110 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.

6.111 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**.

6.112 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.

6.113 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

6.114 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: Active travel proposals
- Policy STC4: Public transport proposals
- Policy STC5: Digital communications

6.115 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
SA1: Climate Change	0	0	0	0	0
SA2: Housing	0	0	0	0	0
SA3: Economic Growth	+	+	+	0	++
SA4: Health	+	+	+	0	0
SA5: Design and the Built Environment	0	0	+	0	0
SA6: Community	+	+	+	0	0
SA7: Services, Facilities and Education	+	0	0	0	0
SA8: Sustainable Travel	++	++	++	++	+
SA9: Pollution	+	+	+	+	+
SA10: Biodiversity and Geodiversity	0	0	+	0	0
SA11: Landscape	0	0	0	0	0
SA12: Cultural Heritage	0	0	0	0	0
SA13: Water	0	0	0	0	0
SA14: Resources	0	0	0	0	0

Policy STC1: Sustainable movement

6.116 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. This will be achieved through the delivery of mixed-use development, which will ensure that communities can access most amenities within a 10 minute walk or cycle of 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.

6.117 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.

6.118 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.119 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.

6.120 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

6.121 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** because the policy outlines numerous ways in which it will support active travel, use of public transport and shared mobility, in addition to electric vehicles. The policy supports the provision of a network of safe, comfortable and attractive walking and cycling routes within developments that also connect into the wider active travel network, in addition to the delivery of enhanced bus services, appropriately located bus stops and shelters. Highway enhancements are also 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**.

6.122 Promoting 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.

6.123 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.124 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.

6.125 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: Active travel proposals

6.126 Policy STC3: Active travel proposals 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 walking and cycling 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.

6.127 Minor positive effects are also expected in relation to **SA Objective 4: Health** and **SA Objective 6: Community** because the walking and cycling network will encourage more 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.

6.128 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.129 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).

6.130 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: Public transport proposals

6.131 Policy STC4: Public transport proposals 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. 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**.

6.132 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.133 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).

6.134 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: Digital communications

6.135 Policy STC5: 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 new major development proposals are expected to incorporate digital infrastructure as one of the essential utilities, in addition to providing a network of open access ducting (open to all fibre providers).

6.136 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**.

6.137 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.138 One reasonable alternative has been considered to Policy STC5: Digital Communications. It is:

- Reasonable Alternative 1: More detailed policy – This option could include more specific requirements for digital communications infrastructure relating to download speeds, ducting and the actual provision of the digital services. However this is likely to stray outside what a formal planning policy can achieve and could also mean that the requirements are too prescriptive resulting in early obsolescence of the standards in the policy.

6.139 Reasonable Alternative 1 has the same intention as Policy STC5 in that it seeks to facilitate economic growth through improvements to the digital communications infrastructure. However, this reasonable alternative option would contain more specific requirements for digital communications infrastructure that may be outside the scope of the Local Plan. Due to the fact this option has the same

intention as Policy STC5, a significant positive effect is expected in relation to **SA Objective 3: Economic Growth** and minor positive effects are expected in relation to **SA Objective 8: Sustainable Travel** and **SA Objective 9: Pollution**. Negligible effects are expected against the remaining SA objectives.

Natural Environment

6.140 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

6.141 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
SA1: Climate Change	0	0	0	0
SA2: Housing	-?	-?	-?	0
SA3: Economic Growth	0	0	0	0
SA4: Health	0	+	+	+
SA5: Design and the Built Environment	0	0	0	0
SA6: Community	0	0	0	0
SA7: Services, Facilities and Education	0	0	0	0
SA8: Sustainable Travel	0	+	0	+
SA9: Pollution	0	+	0	+
SA10: Biodiversity and Geodiversity	0	+	++	++
SA11: Landscape	++	0	0	+
SA12: Cultural Heritage	0	0	0	0
SA13: Water	0	+	0	0
SA14: Resources	0	0	0	0

Policy NE1: Landscape setting areas

6.142 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. 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.

6.143 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.144 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.

6.145 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

6.146 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, in addition to requiring all large-scale residential developments to have easy access to the Valley Parks, which encourages recreational use of the parks.

6.147 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.

6.148 A minor positive effect is expected in relation to **SA Objective 10: Biodiversity and Geodiversity** because in addition to supporting nature conservation and 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.

6.149 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.

6.150 Negligible effects are expected against the remaining SA objective.

Reasonable Alternatives

6.151 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 reasonable and could impact on viability for smaller scale development which may be some distance from the Valley Parks.

6.152 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**.

6.153 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.

6.154 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.

6.155 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

6.156 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 Sites 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.

6.157 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.

6.158 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.

6.159 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.160 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.

6.161 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

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

6.163 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**.

6.164 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.

6.165 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.166 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 reasonable and could impact on viability for smaller scale development.

6.167 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.

6.168 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.

6.169 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.

6.170 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.

History and Heritage

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

- Policy HH1: Conserving and enhancing heritage assets

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

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

SA Objectives	Policy HH1
SA1: Climate Change	+
SA2: Housing	0
SA3: Economic Growth	0
SA4: Health	0
SA5: Design and the Built Environment	+
SA6: Community	0
SA7: Services, Facilities and Education	0
SA8: Sustainable Travel	0

SA Objectives	Policy HH1
SA9: Pollution	0
SA10: Biodiversity and Geodiversity	0
SA11: Landscape	+
SA12: Cultural Heritage	++
SA13: Water	0
SA14: Resources	0

Policy HH1: Conserving and enhancing heritage assets

6.173 Policy HH1: Conserving and enhancing heritage assets 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 enhances the City Wall, and conserves the particular significance of designated and non-designated heritage assets and their settings.

6.174 Policy HH1 is expected to have a minor positive effect against **SA Objective 1: Climate Change** because it sets out that development proposals for historic buildings will be required to minimise carbon emissions and adapt to the impacts of climate change.

6.175 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.

6.176 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.

6.177 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.178 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.

6.179 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.

Culture

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

- Policy C1: Protecting and enhancing cultural and tourism facilities

6.181 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 Policy

SA Objectives	Policy C1
SA1: Climate Change	0
SA2: Housing	0
SA3: Economic Growth	++

SA Objectives	Policy C1
SA4: Health	+
SA5: Design and the Built Environment	0
SA6: Community	0
SA7: Services, Facilities and Education	0
SA8: Sustainable Travel	0
SA9: Pollution	0
SA10: Biodiversity and Geodiversity	0
SA11: Landscape	0
SA12: Cultural Heritage	+?
SA13: Water	0
SA14: Resources	0

Policy C1: Protecting and enhancing cultural and tourism facilities

6.182 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.

6.183 The policy is expected to have a minor positive but uncertain effect in relation to **SA Objective 12: Cultural Heritage** because it seeks to promote access to cultural facilities, which could include designated and non-designated heritage assets, although this is uncertain.

6.184 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.

6.185 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

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

High Quality Places and Design

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

- D1: Design principles

6.188 The likely effects of the policy 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 Policy

SA Objectives	Policy D1
SA1: Climate Change	+
SA2: Housing	0

SA Objectives	Policy D1
SA3: Economic Growth	+
SA4: Health	+
SA5: Design and the Built Environment	++
SA6: Community	+
SA7: Services, Facilities and Education	0
SA8: Sustainable Travel	+
SA9: Pollution	+
SA10: Biodiversity and Geodiversity	+
SA11: Landscape	+
SA12: Cultural Heritage	+
SA13: Water	0
SA14: Resources	0

Policy D1: Design principles

6.189 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.

6.190 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**.

6.191 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.

6.192 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.

6.193 The policy also outlines that retention, refurbishment and enhancement of existing buildings of high townscape value will be supported and a robust and long-lasting framework 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**. Whilst the policy does not specifically protect the historic environment, sensitive and high quality development, and re-use of existing buildings, will help protect heritage features and their settings.

6.194 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.

6.195 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.196 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.

6.197 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.

6.198 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.

Health and Wellbeing

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

- Policy H1: Health and wellbeing

6.200 The likely effects of the policy 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 Policy

SA Objectives	Policy H1
SA1: Climate Change	0
SA2: Housing	0
SA3: Economic Growth	0
SA4: Health	++
SA5: Design and the Built Environment	0
SA6: Community	++
SA7: Services, Facilities and Education	+
SA8: Sustainable Travel	+
SA9: Pollution	+
SA10: Biodiversity and Geodiversity	0
SA11: Landscape	0
SA12: Cultural Heritage	0

SA Objectives	Policy H1
SA13: Water	0
SA14: Resources	0

Policy H1: Health and wellbeing

6.201 Policy H1 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 improved health infrastructure, 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**.

6.202 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 health 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**.

6.203 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.204 One reasonable alternative has been considered in relation to Policy H1: 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.

6.205 The content of this reasonable alternative option would remain the same as Policy H1, 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 H1, 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.

Infrastructure and Community Facilities

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

- Policy IC1: Delivery of infrastructure
- Policy IC2: Community facilities
- Policy IC3: Viability

6.207 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
SA1: Climate Change	+	0	+/-?
SA2: Housing	0	0	+/-?
SA3: Economic Growth	+	0	+/-?

SA Objectives	Policy IC1	Policy IC2	Policy IC3
SA4: Health	+?	++	+/-?
SA5: Design and the Built Environment	+	0	+/-?
SA6: Community	+?	++	+/-?
SA7: Services, Facilities and Education	+?	++	+/-?
SA8: Sustainable Travel	+?	+	+/-?
SA9: Pollution	+?	+	+/-?
SA10: Biodiversity and Geodiversity	0	0	+/-?
SA11: Landscape	0	0	+/-?
SA12: Cultural Heritage	0	0	+/-?
SA13: Water	+?	0	+/-?
SA14: Resources	0	0	+/-?

Policy IC1: Delivery of infrastructure

6.208 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 developer 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.

6.209 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.

6.210 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.211 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.

6.212 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.

6.213 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: Community facilities

6.214 Policy IC2: 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 supports 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.

6.215 Minor positive effects are expected in relation to **SA Objective 8: Sustainable Travel** and **SA Objective 9: Pollution** 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 the potential to help reduce air and noise pollution associated with use of the private car.

6.216 Negligible effects are expected against the remaining SA objectives.

Reasonable Alternatives

6.217 One reasonable alternative has been considered in relation to Policy IC2: 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.

6.218 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 IC3: Viability

6.219 Policy IC3: 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.

6.220 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

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

Cumulative Effects

6.222 This section presents an early assessment of the likely cumulative effects of the Outline Draft Plan as a whole, against each of the 14 SA objectives. It is expected that a more detailed assessment of the Plan's cumulative effects will be possible at the next stage in plan-making.

6.223 **Table 6.14** below presents a summary of the likely effects of the objectives and policies in the Outline Draft Plan.

Table 6.14: Summary of SA findings for the Objectives and Policies in the Outline Draft Plan (August 2022)

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Waste	SA14: Resources
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 CE1: Net-zero Exeter	++	0	+	+	+	0	+	+	+	+	+	+	+	0
Policy CE2: Local Energy Networks	++	0	+	0	0	0	0	0	0	0	0	0	0	0
Policy CE3: Flood Risk	+	0	0	+	0	0	0	0	0	0	0	0	++	0
Policy H1: Housing Requirements	0	++	+	0	0	0	0	0	0	-?	-?	-?	-?	-?
Policy H2: Housing Allocations	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 HS1: The Role of our High Streets	0	+	++	+	+	+	++	+	+	0	0	+	0	+
Policy STC1: Sustainable Movement	0	0	+	+	0	+	+	++	+	0	0	0	0	0
Policy STC2: Active and Sustainable Travel in New Developments	0	0	+	+	0	+	0	++	+	0	0	0	0	0
Policy STC3: Active Travel Proposals	0	0	+	+	+	+	0	++	+	+	0	0	0	0

SA Objective	SA1: Climate Change	SA2: Housing	SA3: Economic Growth	SA4: Health	SA5: Design and the Built Environment	SA6: Community	SA7: Services, Facilities and Education	SA8: Sustainable Travel	SA9: Pollution	SA10: Biodiversity and Geodiversity	SA11: Landscape	SA12: Cultural Heritage	SA13: Waste	SA14: Resources
Policy STC4: Public Transport Proposals	0	0	0	0	0	0	0	++	+	0	0	0	0	0
Policy STC5: 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 HH1: Conserving and Enhancing Heritage Assets	+	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 D1: Design Principles	+	0	+	+	++	+	0	+	+	+	+	+	0	0
Policy H1: Health and Wellbeing	0	0	0	++	0	++	+	+	+	0	0	0	0	0
Policy IC1: Delivery of Infrastructure	+	0	+	+	+	+	+	+	+	0	0	0	+	0
Policy IC2: Community Facilities	0	0	0	++	0	++	++	+	+	0	0	0	0	0
Policy IC3: Viability	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?

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

6.224 The Outline 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 CE1: 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 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 CE2: Local Energy Networks, and there is a policy dedicated to mitigating flood risk and utilising SuDS (Policy CE3: Flood Risk).

6.225 All of the sites allocated in the Outline Draft Plan via Policy H2: Housing Allocations, 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.

6.226 Overall, the Outline 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

6.227 The Exeter Plan will deliver a total of 14,300 new homes over the Plan period, as detailed in Policy H1: Housing Requirements, which incorporates a headroom of 10% and therefore provides greater flexibility in the event that delivery is not as expected. Policy H2: Housing Allocations allocates 28 sites with the capacity for 6,211 new homes, 23 of which are residential sites and five of which are mixed-use and will therefore incorporate housing development alongside other uses. Policy H2 is expected to have a significant positive effect in relation to this objective because the sites it allocates will contribute significantly to housing supply within the city.

6.228 Overall, the Exeter 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

6.229 The Exeter 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 Outline 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.

6.230 Policy HS1: The Role of our High Streets 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' 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 Policy STC5: Digital Communications which will support more flexible working practices through digital communications improvements.

6.231 Policy H2: Housing Allocations 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.

6.232 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.

6.233 Overall, the Exeter 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

6.234 The Exeter 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 H1: Health and Wellbeing and IC2: 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. 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.

6.235 The sites allocated in Policy H2: Housing Allocations 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, open space and sports facilities. 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.

6.236 Overall, the Exeter 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

6.237 The Exeter 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 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 CE1: Net Zero Exeter), an enhanced public realm that incorporates street planting (Policy STC2: Active Travel Proposals), attractive public spaces (Policy HS1: The Role of our High Streets) and protecting and enhancing the character of the city, which includes its unique historic character (Policy HH1: Conserving and Enhancing Heritage Assets).

6.238 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.

6.239 Overall, the Exeter 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

6.240 The Exeter 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 IC2: Community Facilities. Policy H1 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.

6.241 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 Allocations 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.

6.242 Overall, the Exeter 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

6.243 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 Role of our High Streets and IC2: Community Facilities. These, alongside numerous other policies, should combine to mitigate the increased pressure from new development.

6.244 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 was found to have a potential but uncertain mixed

minor positive and minor negative effect overall against this objective.

6.245 Overall, the Exeter 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

6.246 The Exeter 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: Active Travel and STC4: Public Transport Proposals 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.

6.247 The sites allocated in Policy H2: Housing Allocations were assessed against SA objective 8 on the basis of their proximity to sustainable transport links. Almost all of the sites allocated by Policy H2 were found to be within close proximity of a railway station and therefore a significant positive effect was recorded against this objective.

6.248 Overall, the Exeter 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

6.249 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. As is the case with SA objective 8: Sustainable Travel, the Plan includes numerous policies and objectives that seek to reduce the need to travel, which will have the effect of minimising air and noise

pollution triggered by use of the private car. These policies will help to mitigate the potential negative effects of the overall scale of growth proposed. As was the case with SA objective 8, the policies in the 'Sustainable Transport and Communications' section address car use, which will minimise pollution for the reasons outlined under SA objective 8. With regard to residential amenity, Policy EJ2: Retention of Employment Land supports the loss of employment land to an alternative use where the current employment uses have an unacceptable amenity impact of local residents.

6.250 The sites allocated in Policy H2: Housing Allocations were assessed against SA objective 9 on the basis of their proximity to an AQMA, and whether they are within the flightpath of Exeter Airport or close to the M5, and therefore vulnerable to noise pollution. Almost all of the allocated sites were within close proximity of an AQMA but only a couple are susceptible to noise pollution as a result of the flightpath and/or M5.

6.251 Overall, the Exeter Plan is expected to have a cumulative mixed significant negative and minor positive effect (-/+) on SA Objective 9: Pollution.

SA Objective 10: To conserve and enhance biodiversity and geodiversity

6.252 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 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.

6.253 The Outline 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.

6.254 Overall, the Exeter 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

6.255 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 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.

6.256 The Exeter 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 CE1: Net Zero Exeter, HH2: Conserving and Enhancing Heritage Assets and D1: Design Principles). 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.

6.257 Overall, the Exeter 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

6.258 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 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.

6.259 A number of objectives and policies address the protection and enhancement of the historic environment and so should help mitigate the potential negative effects of new development on cultural heritage. In particular, objective 7 and Policy HH1: Conserving and Enhancing Heritage Assets require development proposals to protect and enhance the unique historic character of Exeter, its cultural offering and identity. In addition, Policy HS1: The Role of our High Streets 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.

6.260 Overall, the Exeter 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

6.261 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.

6.262 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 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.

6.263 However, the Outline Draft Plan includes a number of policies seeking to mitigate flood risk, in particular Policy CE3: Flood Risk and to a lesser extent, Policies CE1: Net Zero Exeter and NE2: Valley Parks. 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.

6.264 Overall, the Exeter 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

6.265 Only a small number of policies in the Outline 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 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 Role of our High Streets 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.

6.266 Most of the sites allocated in Policy H2: Housing Allocations 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.

6.267 Overall, the Exeter 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 Exeter Plan

6.268 Table 6.15 summaries the likely overall cumulative effect of the Outline Draft Plan on each of the 14 SA objectives, as described above.

Table 6.15: Summary of cumulative effects of the whole Exeter Plan

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

Recommendations

6.269 A number of recommendations were made in a draft version of this SA Report, as listed in **Table 6.16** below. The table also sets out how the Council has responded to these recommendations.

Table 6.16: Recommendations made previously and Exeter City Council's responses

Policy	Recommendation Made Previously	Exeter City Council's Response
CE1: Net Zero Exeter	Additional wording could be added to the policy to explicitly refer to community-led renewable and low carbon energy projects, if applicable.	Low-carbon energy now inserted into policy. Community-led renewables now stressed in further supporting text. A specific policy on this will be included in a later version of the plan.
CE3: Flood Risk	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.	An additional sentence will be added in the policy referring to a site-specific flood risk assessment.
EJ1: Economic Growth in the Transformational Sectors	Policy EJ1 could require development proposals to be located in areas that are easily accessible by public transport, or via walking and cycling.	" <i>Appropriate</i> " now added to policy requirements and additional wording added to supporting text covering appropriate locations. Future policies

Policy	Recommendation Made Previously	Exeter City Council's Response
		covering suitable locations for employment space will come forward in future policy.
HS1: The Role of our High Streets	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.	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.
NE1: Landscape Setting Areas	The policy could require any new development within the Landscape Setting Area to require effective landscaping.	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).
NE3: Biodiversity	The policy could make reference to SuDS and the fact they can improve the biodiversity value of an area.	Policy CE3 already requires SUDS so the Council does not feel it necessary to repeat it here.
NE4: Green Infrastructure	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.	Policy CE3 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 " <i>green infrastructure</i> " is consistent with existing work the Council has undertaken and DCC and NE terminology.
D1: Design Principles	Policy D1 could make reference to the waste hierarchy and the circular economy.	No change made – Policy CE1 already refers to the circular economy which also covers the waste hierarchy.
IC1: Delivery of Infrastructure	Policy IC1 could specify the different types of infrastructure that will be delivered, instead of just referring to the Infrastructure Delivery Plan.	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.
IC2: Community Facilities	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.	Both CE1 and D1 already cover this issue so the Council does not think it's necessary to repeat it here.

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 to take into account any additional policies proposed by the Exeter Plan and to focus on the SA objectives against which significant (including uncertain) effects have been recorded.

7.3 **Table 7.1** 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.

Table 7.1: Proposed SA monitoring framework for the Exeter Plan

SA Objectives	Indicators	Possible Data Sources
1: To achieve net-zero emissions and support adaptation to unavoidable climate change	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ EPC certificate check ■ Planning application checks for major developments
2: To provide a suitable supply of high quality housing including appropriate mix of types and tenures	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ 5YLS monitoring reports ■ Planning application checks ■ Council tax records
3: To support sustainable and diverse growth of the City's economy and maximise employment opportunities	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ Planning application checks
4: Improve the physical health and wellbeing of residents and reduce health inequalities	<ul style="list-style-type: none"> ■ Proportion of development for over 30 homes or 1000 sq metres that provide a health impact assessment. 	<ul style="list-style-type: none"> ■ Planning application checks
5: Promote high quality design in new development and improve the character of the built environment	<ul style="list-style-type: none"> ■ Proportion of new development coming forward on brownfield land. 	<ul style="list-style-type: none"> ■ Planning application checks
6: To support community cohesion and safety	<ul style="list-style-type: none"> ■ Number of new community facilities developed. 	<ul style="list-style-type: none"> ■ Planning applications checks
7: To provide good access to services, facilities and education	<ul style="list-style-type: none"> ■ Total gains and losses of services and facilities. 	<ul style="list-style-type: none"> ■ Devon County Council

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SA Objectives	Indicators	Possible Data Sources
	<ul style="list-style-type: none"> ■ Progress of infrastructure delivery identified in the Infrastructure Delivery Plan. ■ Amount of money received in developer contributions through development. 	<ul style="list-style-type: none"> ■ Annual infrastructure funding statement
8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ Planning application checks ■ Devon County Council
9: To protect residential amenity by reducing air, noise and light pollution	<ul style="list-style-type: none"> ■ Proportion of new development coming forward adjacent or near to AQMAs. 	<ul style="list-style-type: none"> ■ Planning application checks
10: To conserve and enhance biodiversity and geodiversity	<ul style="list-style-type: none"> ■ Biodiversity net gains achieved through development. 	<ul style="list-style-type: none"> ■ Planning application checks ■ Future net gain monitoring database
11: To conserve and enhance the character and distinctiveness of the landscape	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ Planning application checks
12: To conserve and enhance the historic environment including the setting of heritage assets	<ul style="list-style-type: none"> ■ Condition of Conservation Areas. ■ Number and condition of buildings on the Heritage at Risk register. 	<ul style="list-style-type: none"> ■ Conservation area appraisals ■ Historic England heritage at risk register
13: To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources	<ul style="list-style-type: none"> ■ 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. 	<ul style="list-style-type: none"> ■ Planning applications checks ■ EA information
14: To support efficient use of resources, including land, minerals and waste	<ul style="list-style-type: none"> ■ Proportion of new development coming forward on brownfield land. ■ Amount of ALC grades 1, 2 and 3a lost to development. 	<ul style="list-style-type: none"> ■ Planning applications checks

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SA Objectives	Indicators	Possible Data Sources
	<ul style="list-style-type: none">■ Amount of development coming forward in mineral safeguarding areas or waste consultation zones against DCC advice.	

Chapter 8

Conclusions

8.1 The SA of the Outline 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 Outline 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 Local 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 Outline 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 Outline Draft Plan document between September and November 2022. The consultation responses on the Outline Draft Plan document and this SA Report will be taken into account in the next stages of the plan preparation process.

LUC

September 2022

Appendix A

Consultation Comments Received in Relation to the SA Scoping Report (March 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.

A.2 Table A.1 below sets out a summary of the comments received and the SA Team's response to these comments.

Table A.1: Comments from statutory consultees

Respondent	Comment	SA Team's Response/Action Taken
Environment Agency	<p>Chapter 2: Relevant Plans and Programmes</p> <p>We are pleased to see inclusion of Defra's 25 Year Environment Plan.</p> <p>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.</p> <p>There are a number of others we consider should be included:</p> <ul style="list-style-type: none"> ■ 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 	<p>Updated to refer to the 2020 national flood and coastal erosion risk management strategy for England.</p> <p>These additional plans have been included where relevant.</p>
Environment Agency	<p>Chapter 3: Baseline Information</p> <p>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.</p>	<p>The baseline information has been updated to acknowledge priority habitats.</p>
Environment Agency	<p>Chapter 3: Baseline Information</p> <p>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.</p>	<p>The baseline information has been updated to acknowledge this.</p>

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Respondent	Comment	SA Team's Response/Action Taken
Environment Agency	<p>Chapter 3: Baseline Information</p> <p>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.</p>	<p>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.</p>
Environment Agency	<p>Chapter 3: Baseline Information</p> <p>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.</p>	<p>The baseline information has been updated to include the additional information.</p>
Environment Agency	<p>Chapter 3: Baseline Information</p> <p>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:</p> <ul style="list-style-type: none"> ■ 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 <p>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 Catchment¹⁵.</p>	<p>The baseline information has been updated to make reference to the 7 waterbodies.</p>

¹⁵ [Environment Agency \(2022\) Catchment Data Explorer: Devon East Management Catchment \[online\]](#)

Respondent	Comment	SA Team's Response/Action Taken
Historic England	<p>Chapter 2 and Appendix A: Relevant Plans, Policies and Programmes</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> ■ International – The European Convention on the Protection of Archaeological Heritage. ■ National – Planning (Listed Buildings & Conservation Areas) Act 1990; Ancient Monuments & Archaeological Areas Act 1979; Marine and Coastal Access Act 2009; National Model Design Code (2021); Historic England Future Strategy 2021¹⁶; Historic England Corporate Plan 2021-2022 (instead of 2018-2021)¹⁷; Historic England Heritage at Risk Register (2021)¹⁸; Strategic Framework for Collaborative Action 2020-2025 by the Historic Environment Forum (instead of Heritage 2020)¹⁹; GPA1: The Historic Environment in Local Plans (2015)²⁰; HEAN 3: Site Allocations (2015)²¹; and GPA3: The Setting of Heritage Assets (2017)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). 	<p>Noted.</p> <p>The baseline references local and national documents only. It is assumed that international documents are translated into National and Local policy.</p> <p>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)).</p> <p>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 relating to these suggestions (e.g. heritage assets) will be assessed as part of the appraisal of site options through the SA.</p>
Historic England	<p>Chapter 2 and Appendix A: Relevant Plans, Policies and Programmes</p> <p>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</p>	<p>This additional text has been included.</p>

¹⁶ [Historic England \(2021\) Historic England Future Strategy 2021 \[online\]](#)

¹⁷ [Historic England \(2022\) Historic England Corporate Plan 2022-23 \[online\]](#)

¹⁸ [Historic England \(undated\) Heritage at Risk \[online\]](#)

¹⁹ [Historic Environment Forum \(2020\) Strategic Framework for Collaborative Action 2020-25 \[online\]](#)

²⁰ [Historic England \(2015\) The Historic Environment in Local Plans \[online\]](#)

²¹ [Historic England \(2015\) The Historic Environment and Site Allocations in Local Plans \[online\]](#)

²² [Historic England \(2017\) The Setting of Heritage Assets \[online\]](#)

Respondent	Comment	SA Team's Response/Action Taken
	contribute to local character and distinctiveness would be useful. This reflects the requirements of paragraphs 189 and 190 of the NPPF.	
Historic England	<p>Chapter 3: Baseline Information – Historic Environment</p> <p>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:</p> <ul style="list-style-type: none"> ■ 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 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. 	<p>The proposed changes and additions have been addressed in the historic environment baseline information, where deemed relevant.</p> <p>This point is noted, however, non-designated heritage asset information is not critical for consideration, so has not been included.</p>
Historic England	<p>Chapter 3: Baseline Information – Landscape</p> <p>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.</p>	Noted.
Historic England	<p>Chapter 4: Key Sustainability Issues and Likely Evolution with the Plan</p> <p>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)</p>	<p>The Heritage Assets sustainability issue has been re-worded.</p> <p>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.</p>

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Respondent	Comment	SA Team's Response/Action Taken
	<p>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.</p> <p>We have two further points to make about this section, taking into account baseline information:</p> <ul style="list-style-type: none"> ■ 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. <p>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.</p> <p>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 website²³ and in Heritage and the Environment 2020²⁴.</p>	<p>These points also relate to the actual wording of the Local Plan and its policies rather than the SA.</p> <p>This has been acknowledged in the relevant sections of the baseline information.</p>
Historic England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>Historic England has considered the proposed SA Framework and have the following comments to make on the SA Objectives:</p> <ul style="list-style-type: none"> ■ SA Objective 5 – we support this objective and the associated appraisal questions. We suggest that the relevant SEA Topics includes cultural heritage. ■ SA Objective 11 – we support this objective and the associated appraisal questions. However, we consider that the effects of policy/options on the townscape (e.g. skyline, key views) and on the landscape and water settings of the City need including as appraisal questions either here or 	<p>Cultural heritage has been included as a relevant SEA Topic under SA objective 5.</p> <p>The first appraisal question has been updated to include townscapes, and cultural heritage has been included as a SEA Topic.</p> <p>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</p>

²³ [Historic England \(undated\) Climate Change: Mitigation, Adaptation and Energy Measures \[online\]](#)

²⁴ [Historic England \(2020\) Heritage and the Environment 2020 \[online\]](#)

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	<p>under objective 12. We also suggest that the list of relevant SEA Topics includes cultural heritage and perhaps material assets.</p> <ul style="list-style-type: none"> ■ 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. <p>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.</p> <p>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.</p>	<p>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.</p> <p>Noted.</p>
<p>Natural England</p>	<p>Chapter 2: Relevant Plans and Programmes</p> <p>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:</p> <ul style="list-style-type: none"> ■ Green infrastructure strategies ■ Biodiversity plans ■ Rights of Way Improvement Plans ■ Shoreline management plans ■ Coastal access plans ■ River basin management plans 	<p>Noted. The relevant plans applicable to the plan area have been reviewed.</p>

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	<ul style="list-style-type: none"> ■ 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 	
Natural England	<p>Chapter 3: Baseline Information – Paragraph 3.29 – Greenspace</p> <p>Natural England welcomes the commitment, made by Exeter City Council, to updating the 2005 Parks and Open Spaces Strategy.</p>	Noted.
Natural England	<p>Chapter 3: Baseline Information – Paragraph 3.33 – Green Infrastructure</p> <p>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.</p> <p>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.</p>	Noted.
Natural England	<p>Chapter 3: Baseline Information – Paragraph 3.81 – Biodiversity</p> <p>Natural England advises that it cannot be confirmed that recreational impacts can be screened out for the East Devon Pebblebed Heaths SAC, the East Devon Heaths SPA, the Exe Estuary SPA, and Dawlish Warren SAC until the review of the South East Devon European Mitigation Strategy is complete. The review will need to take into consideration the overall quantum of currently planned and</p>	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.

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	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.	
Natural England	<p>Chapter 3: Baseline Information – Paragraphs 3.92 to 3.97 – Landscape</p> <p>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.</p> <p>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.</p>	A separate landscape sensitivity study is being undertaken, and the findings of this will inform the SA.
Natural England	<p>Chapter 3: Baseline Information – Paragraphs 3.112 to 3.114 – Flood Risk and Coastal Change</p> <p>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).</p>	Noted. Appropriate baseline information has been included for this strategic level of assessment.
Natural England	<p>Chapter 3: Baseline Information – Paragraphs 3.118 to 3.122 – Air Quality</p> <p>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.</p>	Noted. The SA will take account of the findings from the supporting HRA.
Natural England	<p>Chapter 3: Baseline Information – Paragraphs 3.143 to 3.147 – Water Quality</p> <p>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.</p>	The baseline information has been updated to include additional information on water quality.
Natural England	<p>Chapter 3: Baseline Information – General</p> <p>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.</p>	Additional, relevant environmental evidence has been used to inform the SA, particularly the appraisal of site options.

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	<p>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.</p> <p>Please see the attached annex for our advice on sources of local plan evidence on the natural environment.</p>	
Natural England	<p>Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Open Spaces and Recreation</p> <p>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.</p>	Improving people's access to nature has been included in the 'Open spaces and recreation' sustainability issue.
Natural England	<p>Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Biodiversity</p> <p>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.</p>	The 'Biodiversity' sustainability issue has been updated as suggested.
Natural England	<p>Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Landscape</p> <p>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.</p>	Noted. A separate landscape sensitivity study is being undertaken, and the findings of this will inform the SA.
Natural England	<p>Chapter 4: Key Sustainability Issues and Likely Evolution without the Plan – Natural Resources and Pollution</p>	<p>Noted.</p> <p>These effects will be assessed for Stoke Woods SSSI as part of the site options appraisals, using our site appraisal</p>

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	<p>Natural England agrees that avoiding the loss of best and most versatile agricultural land is a key issue for the Local Plan.</p> <p>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.</p> <p>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.</p>	<p>assumptions that will identify the potential effects from proposed development on biodiversity, such as air quality.</p>
Natural England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>SA Objective 1: To achieve net-zero emissions and support adaptation to unavoidable climate change – This objective could include a sub-objective which asks 'will the policy/option support/enable the mitigation and/or adaptation measures needed to address the climate change impacts on the natural environment'.</p>	<p>The recommended sub-objective has been included.</p>
Natural England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>SA Objective 4: Improve the physical and mental health and wellbeing of residents and reduce health inequalities – The third sub-objective should specifically assess, given its known value in improving health and wellbeing, whether the policy/option promotes health and wellbeing by connecting people with nature.</p>	<p>The third sub-objective has been updated as suggested.</p>
Natural England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>SA Objective 8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives – This objective should include a sub-objective that asks 'will the policy/option protect and enhance public rights of way and access, including the England Coast Path and National Trails'.</p>	<p>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?</p>
Natural England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>SA Objective 10: To conserve and enhance biodiversity and geodiversity – For clarity, the Sustainability Appraisal could define which 'ecological assets' the first sub-objective is referring to. For example, the plan should protect ancient woodland and other irreplaceable habitats, and it should protect and promote the recovery of priority species and habitats.</p>	<p>These ecological assets are defined in the site assessment assumptions.</p>

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Natural England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>SA Objective 11: To conserve and enhance the character and distinctiveness of the landscape – Natural England welcomes the commitment in this objective to test whether the plan will protect and enhance the locally valued landscapes, and the character and beauty of the wider countryside.</p>	Noted.
Natural England	<p>Chapter 5: Sustainability Appraisal Framework</p> <p>SA Objective 14: To support efficient use of resources, including land, minerals and waste – To avoid ambiguity, the second sub-objective could refer to 'Best and Most Versatile' agricultural land rather than 'higher quality', though we do support the intention to assess whether the plan avoids development on this valuable resource.</p> <p>This objective could also include a sub-objective that asks 'will the policy/option protect or provide for the sustainable management of soils'.</p>	<p>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.</p> <p>The sub-objectives already included are believed provide appropriate consideration of the impact and management of soils.</p>

Appendix B

Review of Relevant Plans, Policies and Programmes

International Plans and Programmes of Most Relevance for the Local Plan²⁵

B.1 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.2 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.3 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.4 European Nitrates Directive (1991) – Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

B.5 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.6 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.

B.7 European Drinking Water Directive (1998) – Protects human health from the adverse effects of any contamination of

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.

water intended for human consumption by ensuring that it is wholesome and clean.

B.8 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.9 European Water Framework Directive (2000) – Protects inland surface waters, transitional waters, coastal waters and groundwater.

B.10 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.11 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.12 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.13 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.14 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.15 International Convention on Wetlands (Ramsar Convention) (1976) – International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.16 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.17 International Convention on Biological Diversity (1992) – International commitment to biodiversity conservation through national strategies and action plans.

B.18 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.19 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.20 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.21 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.22 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.23 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.24 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.25 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.26 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.27 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.28 Defra, Waste Management Plan for England (2013) – Sets out the measures for England to work towards a zero waste economy.

B.29 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.30 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.31 The 25 Year Environment Plan – 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.32 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.33 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.34 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.35 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.36 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.37 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.38 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.39 Covid-19 mental health and wellbeing recovery action plan (2021) – Sets out the governments 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.40 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.41 Using the planning system to promote healthy weight environments (2020), Addendum (2021) – Provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.42 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.43 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.44 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.45 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.

B.46 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.47 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.48 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.49 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.

Environment (biodiversity/geodiversity, landscape and soils)

B.50 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.51 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.52 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.53 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.54 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.55 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.56 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.57 The Heritage Alliance, Heritage 2020 – Sets out the historic environment sector’s plan for its priorities between 2015 and 2020.

B.58 Historic England, Corporate Plan 2018-2021 – 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.59 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.60 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.61 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.

B.62 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.

Water and Air

B.63 Environment Agency, Managing Water Abstraction (2016) – Is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.64 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.65 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.66 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.67 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) – Provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULESVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.68 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.69 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.70 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.71 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.

B.72 HM Government, 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.73 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.74 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.75 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.76 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.

Transport

B.77 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.78 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.79 Decarbonising Transport: A Better, Greener Britain (2021) – The Decarbonisation 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 DTP 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.80 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.81 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.82 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.83 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.84 Healthy and Happy Communities, Devon's Joint Health and Wellbeing Strategy 2020-2025 (2019) – The strategy is guided by the principles in the King's Fund: Four Pillars of Population Health (2018) and World Health Organisation: The Minsk Declaration. This strategy sets priorities and overall direction for the Devon Health and Wellbeing Board and local health, care and wellbeing organisations. The strategy sets out 4 priorities which are:

- Create opportunities for all, inclusive economic growth, education and social mobility;
- Healthy, safe, strong and sustainable communities creating conditions for good health and wellbeing where we live, work and learn;
- Focus on mental health building good emotional health and wellbeing, happiness and resilience; and
- Maintain good health for all supporting people to stay as healthy as possible for as long as possible.

B.85 Draft Resource and Waste Management Strategy for Devon and Torbay – The proposed 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. A public consultation was held between 3rd March 2021 to 14th April 2021. 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.86 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.87 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.88 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.89 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.90 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.91 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.92 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.93 Exeter City Council has prepared **Supplementary Planning Documents (SPD's)** where necessary to amplify policies in the Local Plan. SPDs are supporting documents for the Local Plan which add to or expand upon policies, but do not include site allocations. The following SPDs have been adopted and are a material consideration in determining planning applications:

- Affordable Housing SPD
- South-west Exeter Development brief SPD
- Archaeology and Development SPG
- Sustainable Transport SPD
- Householder's Guide to Extension Design SPD
- HMO (including Class C4 Uses) SPD and Article 4 Direction
- Planning Obligations SPD
- 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.94 St James Neighbourhood Plan (Adopted July 2013) –

St James sits to the north of Exeter City Centre. The Neighbourhood Plan has been prepared by members of the community to guide future changes to create a balanced and vibrant community. The Plan aims to address the challenges St James faces by defining projects to improve the area and by setting out policies to influence planning decisions. The most important aims include:

- Establish a clear vision for the ward that most people in the community support;
- Define a local hub for St James;
- Build on new planning rules to restrict HMO development and rebalance the community;
- Encourage those types of development that meet the needs of the community;
- Manage the impacts of traffic and encourage sustainable transport;
- Improve the natural and built environment of the ward; and
- Support and maintain community facilities and services within the ward.

B.95 Greater Exeter Strategic Plan (GESP) Draft Policy and Site Options Document (June 2020) –

Until 2020, Exeter City Council, along with East Devon, Mid Devon and Teignbridge District Councils, was working on the preparation of the Greater Exeter Strategic Plan (GESP). The intention was that the GESP would set out strategic policies and proposals for building and land use in the Greater Exeter area up to 2040. However, work on the plan ceased in 2020 after East Devon District Council withdrew from participation. The plan did not progress beyond the Draft Policy and Site Options Document (Regulation 18).

B.96 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.97 The Development Delivery Plan reached the stage of the Publication Version (July 2015) but was not progressed any further.

B.98 Exeter Area and East Devon Growth Point Green Infrastructure Strategy – Phase II (December 2009) –

This Strategy builds on the first study published in April 2009 (which established a vision and objectives for GI investment, opportunities, potential initiatives and delivery challenges – answering the 'why?' and 'where?' questions), and provides greater detail in respect of specific opportunities to shape Green Infrastructure investment and of the means by which the local planning system – through the LDF and site masterplans for example – and delivery agencies will together drive the successful execution of the Strategy. This complements the Study by answering the 'how?' and 'when?' questions. Four objectives are proposed:

- To increase biodiversity;
- To mitigate and adapt to climate change;
- To manage growth and promote economic development; and
- To improve the health and well being of our local communities.

B.99 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.100 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.101 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.102 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.103 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.104 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.105 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;
- 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.106 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.107 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.108 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.109 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.110 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.111 Exeter Housing Market Area Strategic Housing Market Assessment Final Report 2014/15 – The Exeter Strategic Housing Market Assessment (SHMA) 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.112 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.113 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.114 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.115 Exeter City Council Air Quality Annual Status Report (2021) – The status report that is produced annually monitors air quality within the City. During 2020 there have been no exceedances of NO₂ air quality objectives at any sites in Exeter, all sites fell below the objective levels. The significant fall was caused by a reduction in traffic flows as a result of COVID-19. 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.116 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.117 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.118 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.119 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.120 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.

B.121 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.122 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.123 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.124 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.125 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. The Proposed Submission Local Plan 2020-2040 will be available for consultation in 2022.

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)²⁶. This is influenced by the high student population – in 2020/21 it was estimated that there was a total of 21,760 students living in Exeter²⁷.

C.2 Table C.1 below presents the most recent estimates of population by ward in Exeter as of 2020²⁸.

Table C.1: Estimated populations by ward in Exeter City Council (2020)

Ward	Estimated Population (2020)
Alphington	8,439
Duryard and St James	16,663
Exwick	9,800
Heavitree	9,560
Mincinglake and Whipton	9,379
Newtown and St Leonard's	11,075
Pennsylvania	10,547
Pinhoe	8,057
Priory	9,435
St David's	11,815
St Loyes	9,747

²⁶ [Office for National Statistics \(2021\) Phase one of Census 2021 results – First results \[online\]](#)

²⁷ Annual Student Accommodation Report to Exeter City Council Planning Member Working Group (June 2021)

²⁸ [Office for National Statistics \(2020\) Population projections for local authorities: Table 2 \[online\]](#)

Ward	Estimated Population (2020)
St Thomas	9,936
Topsham	8,880

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 627 homes per annum²⁹.

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

- 348 net additional homes (not including Purpose Built Student Accommodation); and
- 2,230 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 Yea	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

Reporting Yea	Number of Dwellings Completed
2015/16	618
2016/17	508
2017/18	473
2018/19	621
2019/20	553
2020/21	348

C.6 Table C.2 shows how housing completions in 2020/21 amount to 348 dwellings, which is significantly lower than previous years but reflects the impact on the construction industry of COVID-19 and related national lockdowns. There is no evidence that suggests that there will be continued longer term effects from the pandemic on the deliverability of sites.

C.7 Exeter's five year (2022/23 – 2026/27) housing requirement is 3,292 homes, as outlined in the Five Year Housing Supply Statement³⁰. The deliverable supply of housing identified in the next five years (2021/22 to 2025/26) is summarised in **Table C.3** below and shows there is a total net supply of 3,588 homes. Therefore, against the five year housing requirement, the Council is currently able to demonstrate a supply of five years and five months for the period commencing 1 April 2021.

C.8 Supporting Exeter's housing delivery is the Liveable Exeter³¹ 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 City³².

C.9 Exeter University currently expects the number of students in need of accommodation to increase by around 1,360 between 2020/21 and 2022/23, before dropping by around 160 to 2024/25 and then rising again in 2025/26. Overall, this equates to an estimated net increase of just under 940 students in need of accommodation (either purpose-built student accommodation or general housing stock) between 2020/21 and 2025/26³³.

C.10 A record amount of purpose-built student accommodation (PBSA) was delivered in Exeter in 2020/21, to the extent that 53% of students in need of accommodation are now housed in PBSA, up from 46% in the previous year. This

²⁹ [Exeter City Council \(2020\) Authority Monitoring Report: 2020/21 Monitoring Report \[online\]](#)

³⁰ [Exeter City Council \(2021\) Five Year Housing Land Supply Statement \[online\]](#)

³¹ [Liveable Exeter \(2020\) The Liveable Exeter Place Board \[online\]](#)

³² [Exeter City Council \(2019\) Liveable Exeter – A Transformational Housing Delivery Programme \[online\]](#)

³³ Report to Exeter City Council Planning Member Working Group (June 2021)

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 Polsloe³⁴.

Table C.3: Total net housing supply 2021/22 to 2025/26

Type of Site	2021/22	2022/23	2023/24	2024/25	2025/26	Total 5 Year Supply (Net)
Major sites with consent/resolution to approve	551	824	1,054	628	330	3,387
Small sites with consent/resolution to approve	66	121	0	0	0	187
Identified sites without planning consent	0	0	0	0	0	0
Windfalls	0	0	0	0	14	14
Total net supply	617	945	1,054	628	344	3,588

Housing Stock and Condition

C.11 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 2011 Census recorded that Exeter has lower levels of owner-occupation at 59.8% compared to the South West at 67.4% and nationally at 63.4%, and also had the highest level of social stock in Devon of 17%, similar to the national level of 17.7%. The level of private rented accommodation in Exeter was 22.2%, reflecting the nature of the City when compared to more rural districts in Devon where levels of private rent is lower³⁵.

C.12 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 City³⁶.

C.13 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

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%)

³⁴ Report to Exeter City Council Planning Member Working Group (June 2021)

³⁵ Exeter Housing Market Area Strategic Housing Market Assessment (SHMA) Final Report 2014/15

³⁶ [Exeter City Council \(2022\) Council to retrofit all its homes to reduce carbon and lower fuel bills \[online\]](#)

Stock	East Devon	Exeter	Mid Devon	Teignbridge
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.14 The housing market in Exeter is expensive and residents struggle to afford homes. This is due to a number of reasons:

- As of December 2021, the average house price in the UK was £274,712, whereas the average house price in Exeter was £297,173³⁷;
- 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.15 Within the South West as a whole, 1.41 households were assessed as homeless per 1000 during July to September 2021. During the same period, 2.04 households in Exeter were assessed as homeless per 1000, which is above the South West figure³⁸. 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.16 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.17 The health of residents of Exeter was described as 'Very Good' or 'Good' by 83% of the population compared to 81.5% for the South West and 81.2% for England and Wales. Only 4.8% of Exeter's population described their health as 'Bad' or 'Very Bad', compared to the figure of 5.1% for the South West and 5.6% for England and Wales.

C.18 At the time of writing, the UK including Exeter, is just emerging from the coronavirus pandemic. The Devon County Council Public Health Annual Report (2020-21) focused on the COVID-19 pandemic and outlines that the proportion of people in Devon with COVID-19 had been small when compared to the wider UK but that the pandemic had not affected everyone equally, and had made existing health inequalities worse in Devon. The medium and long-term impacts of the public health crisis will take time to become known. As new data emerges, the SA baseline will be updated to reflect this.

Life Expectancy

C.19 Life expectancy at birth in 2019 in Exeter was 79.1 years for males and 84.1 years for females. The figures for Exeter are lower for males than the regional value of 80.3 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 females³⁹.

Obesity

C.20 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 year⁴⁰.

³⁷ [Land Registry \(2022\) UK House Price Index \[online\]](#)

³⁸ [Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government \(2013, updated 2022\) Homelessness statistics \[online\]](#)

³⁹ [Office for Health Improvement and Disparities \(2019\) Local Authority Health Profiles \[online\]](#)

⁴⁰ [Obesity Health Alliance \(2017\) OHA Briefing Paper: Costs of Obesity \[online\]](#)

C.21 56.8% of adults in Exeter were classified as overweight or obese in the period 2019/20⁴¹. This is lower than the regional value of 62.0% and England value of 62.8%. The value in Exeter has dropped from 59.8% since 2015/16. Within Exeter in Year 6 at school, 28.5% 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%⁴².

C.22 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 respectively⁴³. 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 figure⁴⁴.

Perception of Wellbeing

C.23 Residents of Exeter reported having higher levels of life satisfaction (7.4 out of 10.00) than the average for UK 7.39 in the period 2020/21. However, 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 7.3 in the period 2020/21 and are lower than the UK average of 7.71. Average figures recorded relating to 'happiness' are lower than the previous seven years (7.3) in the 2020/21 period. Average levels of anxiety have increased to 3.7 for the period 2020/21, and are higher than all previous years. While average ratings of life satisfaction, worthwhile, happiness and anxiety have deteriorated within Exeter, this aligns with the UK averages. The recorded figures in the period 2020/21 cover the COVID-19 pandemic including national lockdowns, which should be considered alongside the figures⁴⁵.

C.24 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 themes⁴⁶.

C.25 One in four adults and one in ten children experience mental health problems to some degree in any year. Poor mental health carries an economic and social cost of over a £100 billion each year in England. 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. Devon's population compares well nationally and to similar areas when looking at indicators of physical health but compares much less favourably when we consider measures of mental health. Mental and behavioural health account for almost half of persons claiming disability benefits in Devon⁴⁷.

Social Isolation

C.26 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 lonely⁴⁸. 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.27 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

⁴¹ [Office for Health Improvement and Disparities \(2021\) Public health profiles \[online\]](#)

⁴² [Office for Health Improvement and Disparities \(2021\) Public health profiles \[online\]](#)

⁴³ [National Health Service \(2020\) Statistics on Obesity, Physical Activity and Diet 2020: Data tables \[online\]](#)

⁴⁴ [National Health Service \(2020\) Statistics on Obesity, Physical Activity and Diet 2020: Data tables \[online\]](#)

⁴⁵ [Office for National Statistics \(2021\) Personal well-being in the UK: April 2020 to March 2021 \[online\]](#)

⁴⁶ [Devon County Council \(2019\) Joint Health and Wellbeing Strategy \[online\]](#)

⁴⁷ [Devon County Council \(2019\) Annual Public Health Report 2018-19: Mental Health \[online\]](#)

⁴⁸ [Office for National Statistics \(2021\) Mapping loneliness during the coronavirus pandemic \[online\]](#)

very vigorous intensity activity; or a combination of moderate, vigorous and very vigorous intensity activity⁴⁹.

C.28 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 stress⁵⁰.

C.29 The Audit of Outdoor Recreation Facilities⁵¹ 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 Strategy⁵². Work underway for the new Parks and Greenspace Strategy has found the following⁵³:

- 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 0.8 Ha of formal (parks and gardens) open space for every 1,000 head of population. In Exeter there is 0.26 Ha of Formal greenspace and 0.85 Ha per 1,000 people when formal and informal green space are counted together;
- People value their local greenspace highly, regardless of any classification that may be placed upon it, and they have a connection to the greenspaces they use; and
- There remain problems of increasing costs and reduction in budgets, leaving limited options to safely maintain the land and assets the Council holds.

C.30 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 rugby⁵⁴.

C.31 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.32 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 future⁵⁵. 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.33 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)⁵⁶. 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

⁴⁹ UK Chief Medical Officers (2019) UK Chief Medical Officers' Physical Activity Guidelines

⁵⁰ Houses of Parliament Parliamentary Office of Science and Technology (2016) Green Space and Health

⁵¹ Exeter City Council (June 2005) Audit of Outdoor Recreation Facilities

⁵² [Exeter City Council \(2020\) Why a new strategy? \[online\]](#)

⁵³ [Exeter City Council \(2021\) Overview \[online\]](#)

⁵⁴ [Exeter City Council \(2019\) Draft Built Facilities, Playing Fields, Pitches, Play Areas, Parks and Open Spaces \[online\]](#)

⁵⁵ [Exeter City Council \(2020\) Authority Monitoring Report: 2020/21 Monitoring Report \[online\]](#)

⁵⁶ [Exeter Area and East Devon Growth Point \(2009\) Green Infrastructure Strategy – Phase II \[online\]](#)

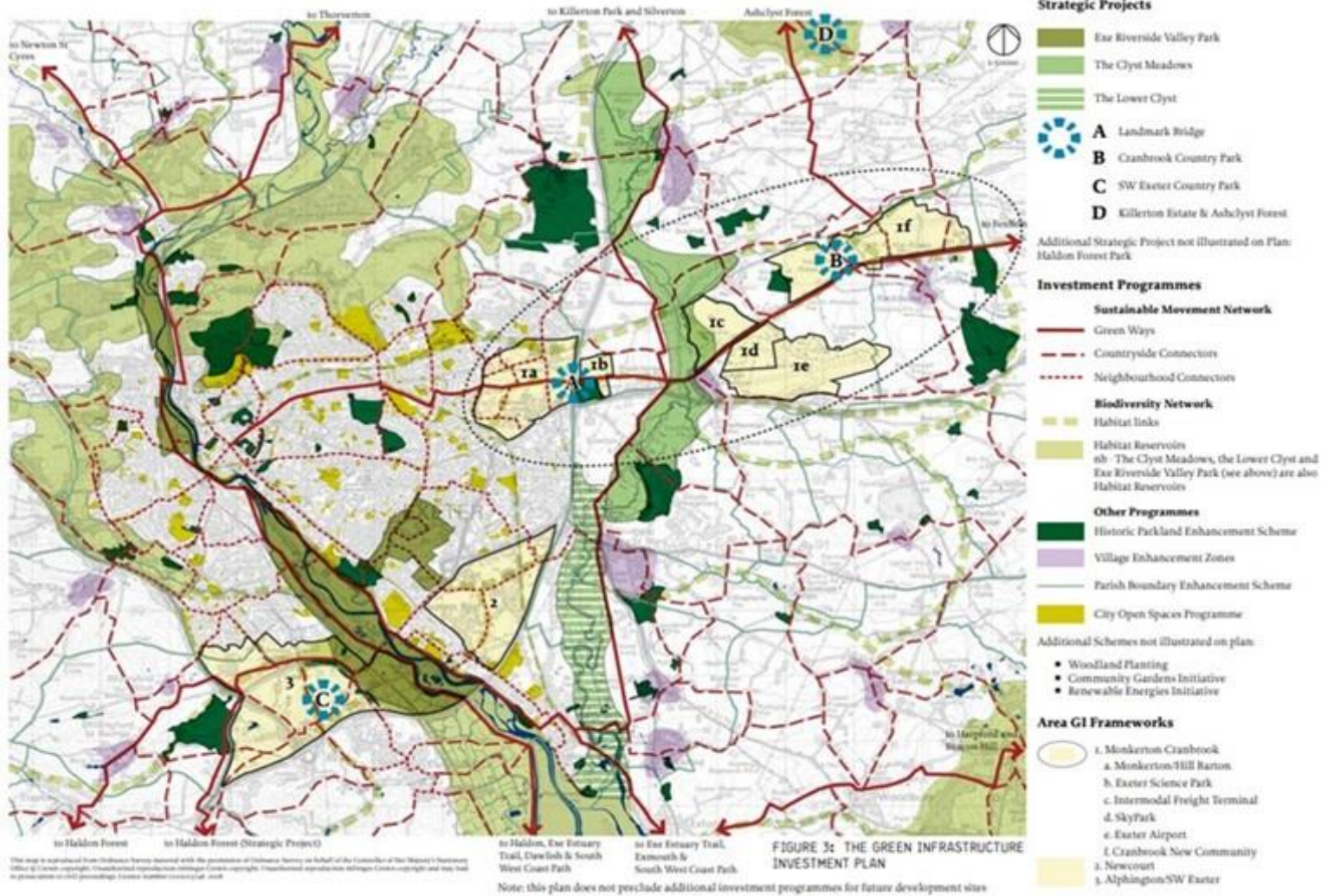
enhancement whilst embracing economic regeneration, growth and sustainable development. In the particular, the study:

- Provides a framework to guide sustainable development;
- Enhances the accessibility of key assets, leisure facilities, open and semi natural green space, wildlife areas and the countryside;
- Identifies new opportunities for walking, cycling and other forms of sustainable transport to enhance the existing network;
- Establishes the broad framework required to improve recreation and leisure activities to promote healthier lifestyles;
- Identifies opportunities for creating linked habitat networks leading to increased ecological value, biodiversity and species persistence; – identifies general opportunities for the enhancement of quality, functionality and character of urban fringe landscapes in line with Countryside in and Around Towns (CIAT) guidance;
- Draws together existing data on the physical, natural, ecological, landscape and recreational assets; and
- Provides supporting information and a steer on the options available to offset/mitigate impacts on national and internationally designated sites in and adjacent to the core study area.

C.34 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 Strategy⁵⁷.

⁵⁷ [Exeter Area and East Devon Growth Point \(2009\) Green Infrastructure Strategy – Phase II \[online\]](#)

Figure C.1: Green Infrastructure Investment Plan



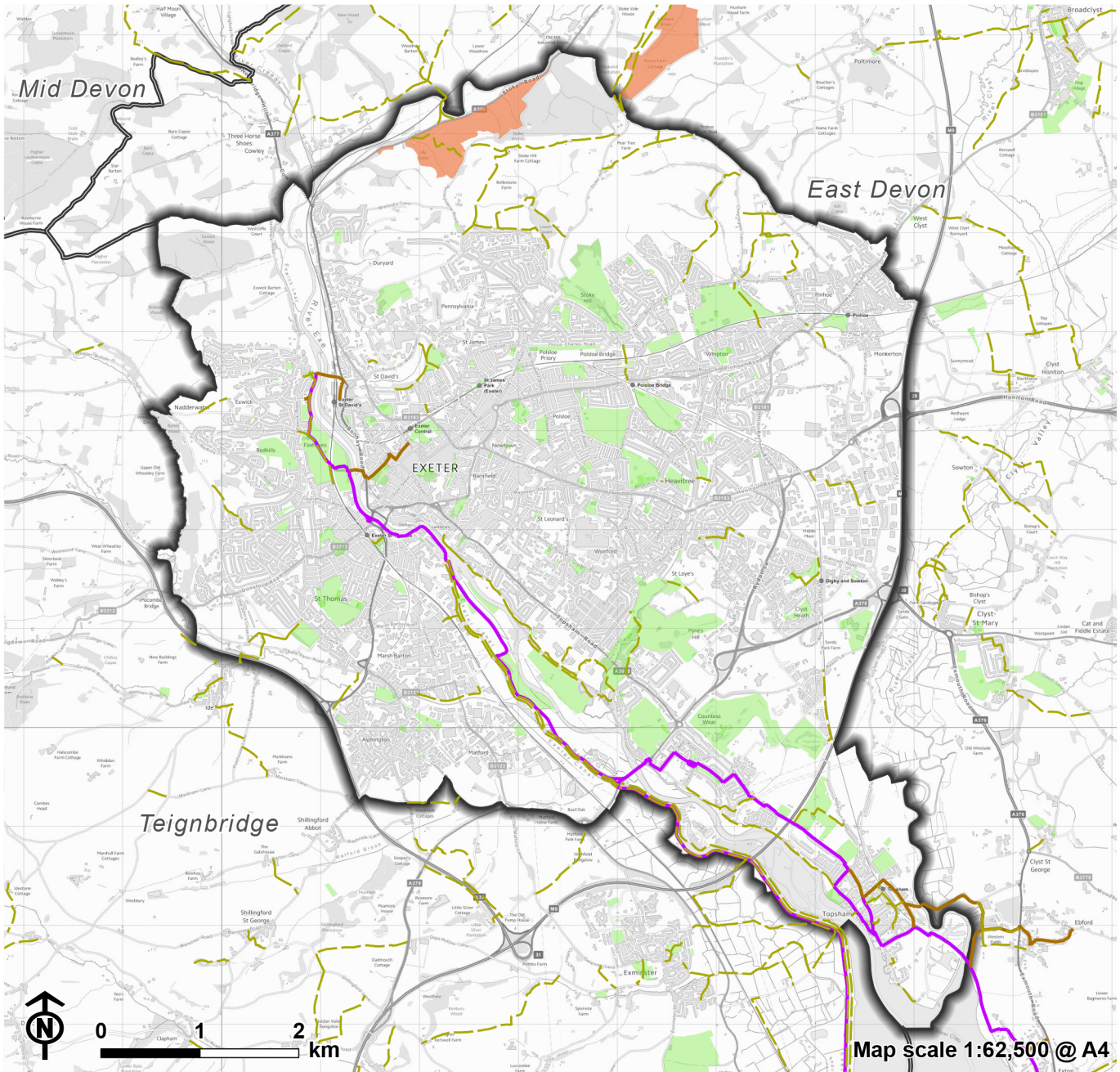
C.35 Devon County Council is responsible for 3,108 miles (5,002km) of public rights of way (see **Figure C.2**), and has a target of keeping 90% of public rights of way in an 'easy to use' condition. Since 2009 the proportion of rights of way classified as 'easy to use' in Devon has stayed above this 90% benchmark⁵⁸. 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 City⁵⁹. 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.

⁵⁸ [Devon Local Nature Partnership \(2018\) State of Environment Report \[online\]](#)

⁵⁹ [Liveable Exeter \(2020\) Active Travel \[online\]](#)

CB: EB: Tembo_L LUC 11938_Exter_MainReportMaps_v1 02/08/2022 Source: Sustrance, NE.



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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.36 The most recent Active Lives Survey (reporting for the period May 2020/21) estimated that 20.97% of the population in Exeter are classified as inactive, doing less than 30 minutes of moderate exercise a week. This is lower than the figure for Devon of 22.3% for the same period. It is reported that 70.20% 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 67.36%⁶⁰.

C.37 In Exeter 79.6% of people walk once a week. The walking average was higher than the national average for England at 67.3%. In relation to cycling, 16.8% of people in Exeter cycle once a week. The national average for England for cycling is 11.6%⁶¹.

Services and Facilities, including Education

C.38 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 550,000⁶². The University of Exeter and Exeter College are also centres of educational excellence and both continue to expand.

C.39 Across Exeter, there are 36 primary schools, 18 secondary schools, six colleges, three special schools and one University.

C.40 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 2016-2033⁶³. 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*	2019-2033

*To support development in Teignbridge as well as Exeter and on Exeter's borders (e.g. East Devon).

Deprivation

C.41 The Indices of Deprivation 2019⁶⁴ 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.42 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.43 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.

⁶⁰ Sport England (2021) Active Lives data tables [online]

⁶¹ Department for Transport (2018, updated 2022) Walking and cycling statistics (CW) [online]

⁶² Exeter City Council (2019) Exeter economy in numbers [online]

⁶³ Devon County Council (2016) Education Infrastructure Plan (revised) 2016-2033 [online]

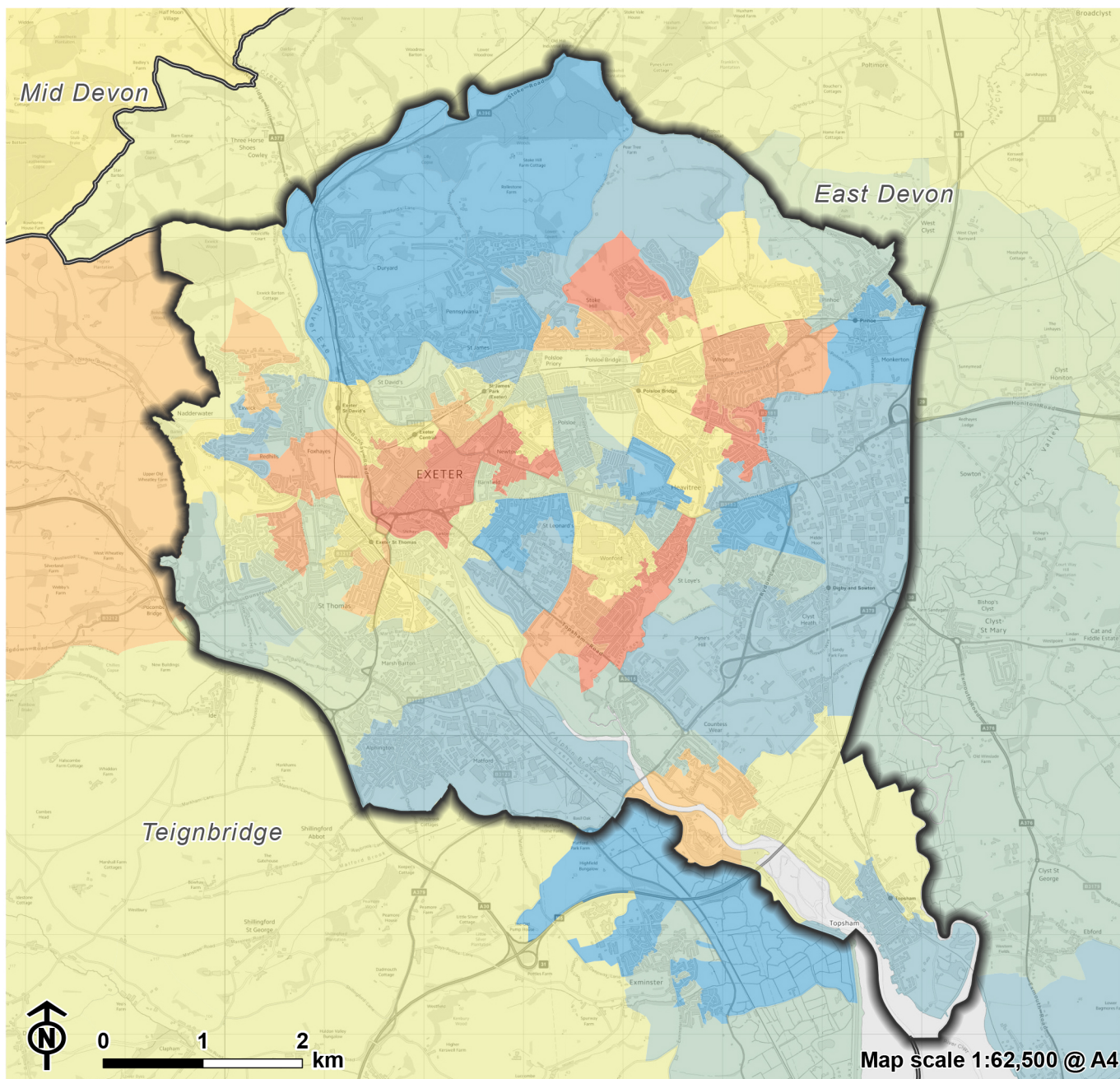
⁶⁴ Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019 [online]

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.44 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 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.45 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 cities⁶⁵. The overall crime rate in Exeter in 2021 was 68 crimes per 1,000 people. This compares poorly to Devon's overall crime rate, coming in 23% higher than the Devon rate of 52 per 1,000 residents. However, crime rates have not significantly worsened since 2016 when the crime rate per 1,000 people in Exeter City was 67. 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.

C.46 The most common crimes in Exeter are violence and sexual offences, with 3,928 offences during 2021, giving a crime rate of 31. This is 9% higher than 2020's figure of 3,580 offences and a difference of 2.77 from 2020's crime rate of 28. Exeter's least common crime is robbery, with 62 offences recorded in 2021, an increase of 29% from 2020's figure of 44 crimes.

C.47 The Exeter Community Safety Partnership⁶⁶, 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.48 The Devon economy has witnessed steady growth since 1997 with an increase of 102% between 1997 and 2015⁶⁷. 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 boundaries⁶⁸.

C.49 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)⁶⁹. 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.50 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 2010⁷⁰. Exeter also has the highest productivity levels in Devon equivalent to 93% of the national average.

Business Sectors and Employment Rates

C.51 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 industry⁷¹.

⁶⁵ [CrimeRate \(2022\) Crime and Safety in Exeter \[online\]](#)

⁶⁶ [Exeter City Council, Exeter Community Safety Partnership \[online\]](#)

⁶⁷ [Devon Local Nature Partnership \(2018\) State of Environment Report \[online\]](#)

⁶⁸ [Devon County Council \(2014\) Exeter Area Profile \[online\]](#)

⁶⁹ [nomis \(2022\) Labour Market Profile – Exeter \[online\]](#)

⁷⁰ [Office for National Statistics \(2017\) Regional GVA\(I\) by local authority in the UK \[online\]](#)

⁷¹ [nomis \(2022\) Labour Market Profile – Exeter \[online\]](#)

Table C.7: Employee jobs by industry in Exeter (2020)

Industry	Employee Jobs	Percentage
Human Health and Social Work Activities	18,000	19.1%
Wholesale And Retail Trade; Repair of Motor Vehicles and Motorcycles	13,000	13.8%
Education	11,000	11.7%
Professional, Scientific and Technical Activities	9,000	9.6%
Administrative and Support Service Activities	8,000	8.5%
Public Administration and Defence; Compulsory Social Security	7,000	7.4%
Accommodation and Food Service Activities	6,000	6.4%
Information and Communication	4,500	4.8%
Construction	4,000	4.3%
Manufacturing	3,000	3.2%
Transportation and Storage	2,500	2.7%
Financial and Insurance Activities	1,750	1.9%
Water Supply; Sewerage, Waste Management and Remediation Activities	1,500	1.6%
Real Estate Activities	1,500	1.6%
Other Service Activities	1,500	1.6%
Arts, Entertainment and Recreation	1,250	1.3%
Electricity, Gas, Steam and Air Conditioning Supply	1,000	1.1%
Mining and Quarrying	10	0%

C.52 In 2020 the rate of economically active residents in the South West was 80.2%. During the same period the figure for Exeter was 73.4%. Furthermore, in Exeter 6.6% were self-employed, and 3.9% unemployed, with the remaining either full-or part-time employed. This compared to 4.8% unemployment nationally⁷². 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.53 In 2021, gross weekly pay in Exeter was £592.80, which was higher than the regional average of £577.30 but lower than the national average of £613.00.

Business Stock

C.54 In 2021 Exeter had a total of 4,430 Business Enterprises, of which 96.7% were Micro or Small⁷³. 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.

⁷² [nomis \(2022\) Labour Market Profile – Exeter \[online\]](#)

⁷³ [nomis \(2022\) Labour Market Profile – Exeter \[online\]](#)

C.55 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 economy⁷⁴.

Retail

C.56 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 successful⁷⁵.

C.57 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.58 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.59 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

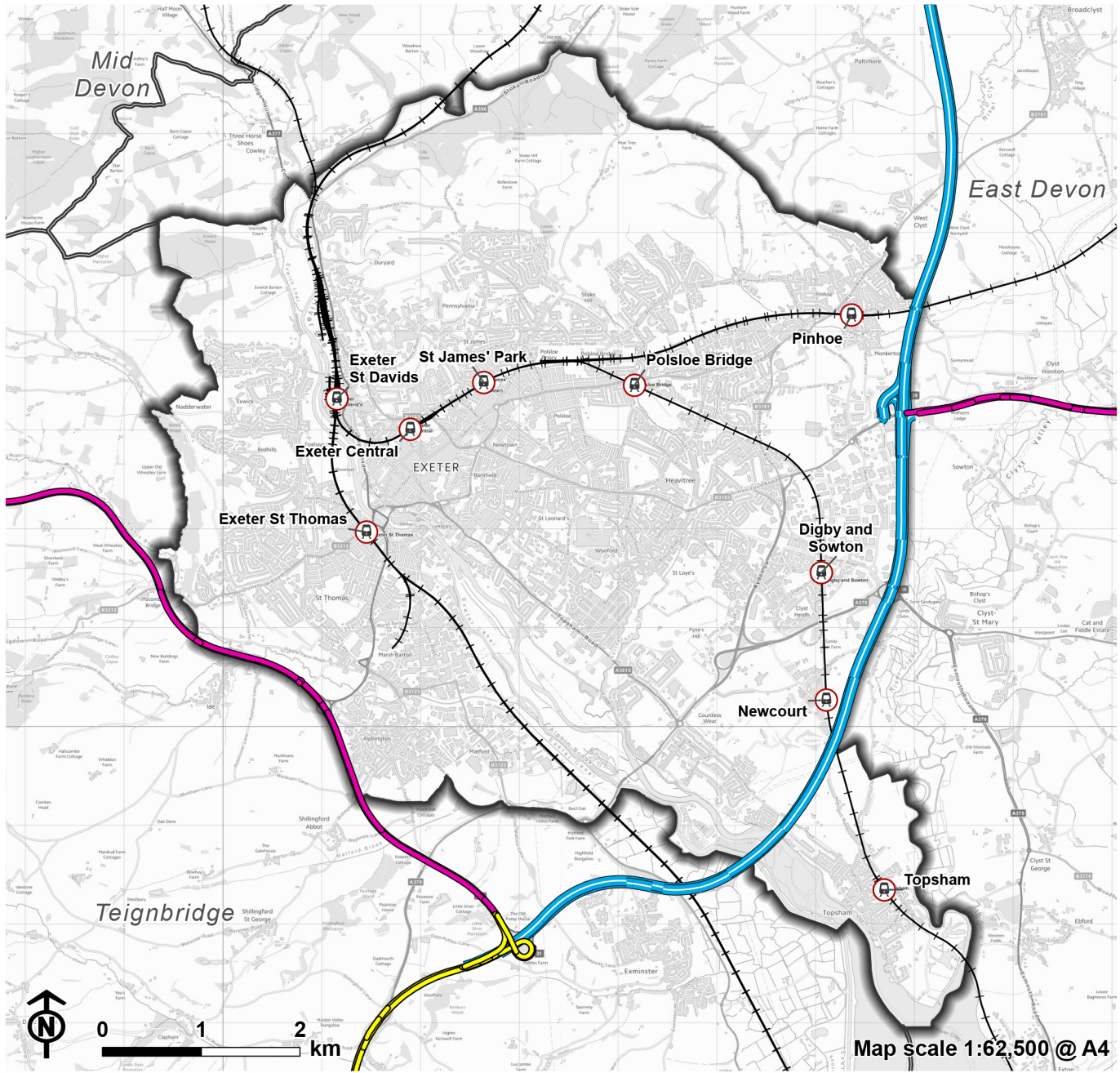
C.60 Exeter is served by the M5 motorway, and the A30 and A38 trunk roads, and benefits from the convergence of five railway lines, including fast connections to London and the North (see **Figure C.4**). Train services connect the City to the main commuter towns of Exmouth and Crediton. Exeter International Airport is only 7km from the City Centre.

C.61 According to the 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.

⁷⁴ [Exeter City Council \(2020\) Authority Monitoring Report: 2020/21 Monitoring Report \[online\]](#)

⁷⁵ Exeter City Council and East Devon District Council (2016) Exeter and West End of East Devon Retail and Leisure Study 2016

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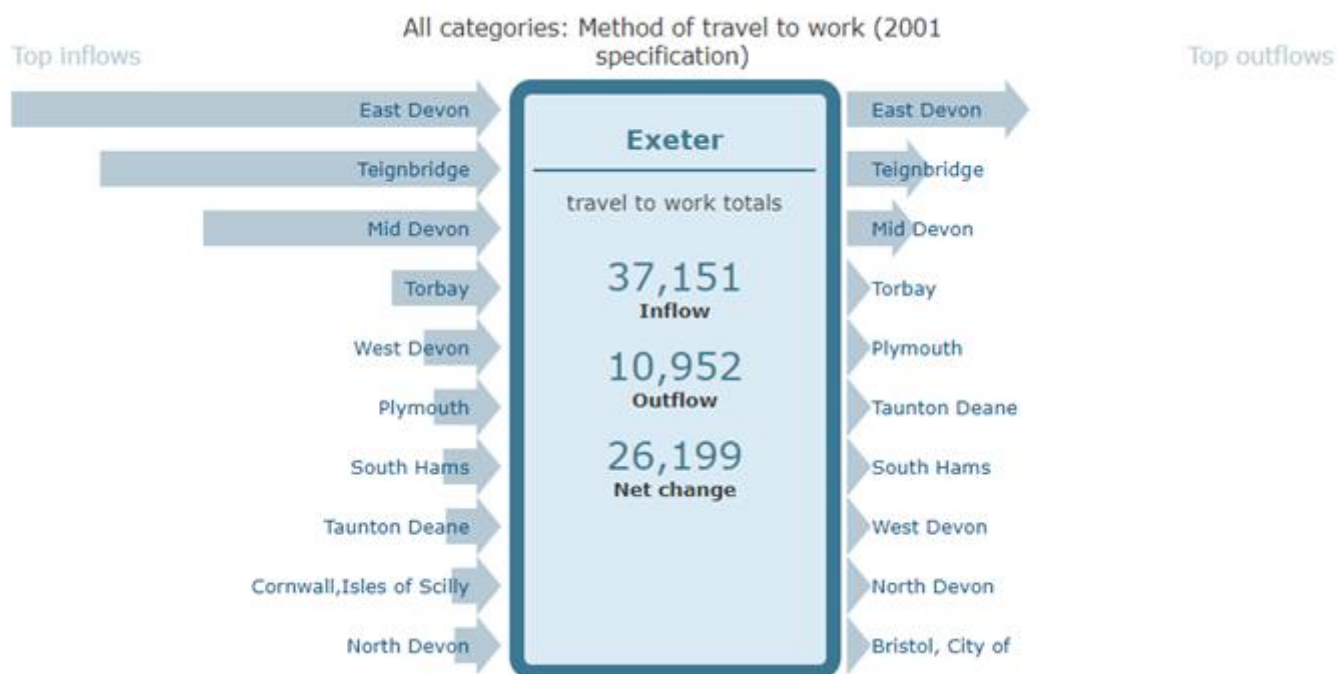


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Figure C.4: Transport Network

- 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 Growth⁷⁶

C.62 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.63 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.64 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.65 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.66 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.67 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.68 Alongside this, urban centre regeneration schemes must strive to reduce the dominance of vehicular traffic and ensure

⁷⁶ [Devon County Council \(2020\) Exeter Transport Strategy \(2020-2030\) \[online\]](#)

amenities and services are located within a reasonable walking and cycling distance.

C.69 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.70 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.71 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 transport⁷⁷.

C.72 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.73 The Exeter City Council Authority Monitoring Report 2020-2021 continues to demonstrate Exeter's increasing coverage by public transport, including:

- Bus and rail infrastructure:
 - Exeter Bus Station: In 2020 progress was made towards the opening of the new bus station 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 2022. 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 and a pedestrian/cycle path.
 - Pinhoe Rail Station Interchange: Planning permission for this project was approved in March 2021, with talks to commence in early 2022. The

project aims to improve the attractiveness and facilities available at the station.

- Cycle and pedestrian enhancements: In 2020/21 numerous traffic calming measures were introduced along Exeter's strategic cycle routes in addition to the following developments:
 - Cycle Route E4: Summer Lane bridge, Pinhoe Road and Exhibition Way sections completed.
 - Cycle Route E9: New pedestrian/cycle crossing on Russell Way.
 - Countess Wear roundabout: Rydon Lane pedestrian/cycle crossing.

C.74 In 2020/21 new Co Bike (Exeter's on street electric bike hire scheme) sites were introduced at Princesshay, Sidwell Street, and Cowick Street, and the site at County Hall was expanded. During 2020, the use of the Co Bike network increased by over 400%.

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

⁷⁷ [Devon County Council \(2020\) Exeter Transport Strategy \(2020-2030\) \[online\]](#)

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 SSSI⁷⁸. 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:

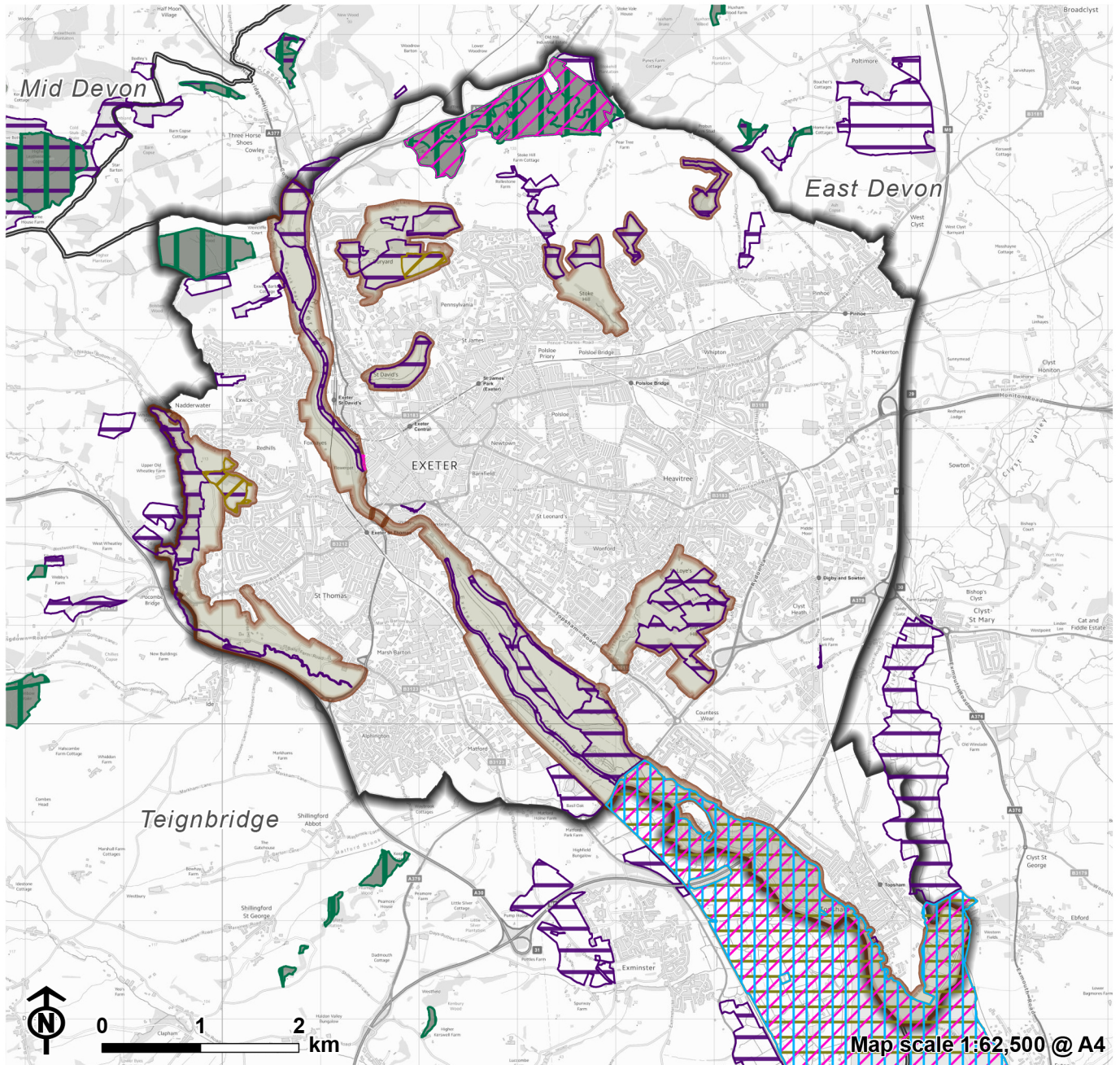
- Direct loss of habitats;
- Habitat fragmentation/isolation;
- Urbanisation impacts (lighting, traffic collisions, fire, noise, cat predation, invasive species, pollution);
- Air and water quality/quantity impacts; and
- Recreational impacts.

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	75.61%	29.84%	45.77%	4.83%
England	90.24%	38.15%	52.09%	4.27%

⁷⁸ [Exeter City Council \(2020\) Authority Monitoring Report: 2020/21 Monitoring Report \[online\]](#)

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Figure C.6: Environmental Designations

- | | |
|------------------------|-------------------------------------|
| Exeter City boundary | Natural Heritage |
| Neighbouring authority | 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 City⁷⁹. 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*)⁸⁰. 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 England⁸¹.

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** below⁸².

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

Designated Site	Category	Condition
Church of St Thomas the Apostle, Cowick Street, Exeter	Listed Place of Worship Grade I	Poor

⁷⁹ [Heritage Gateway \(2020\) Exeter City HER \[online\]](#)

⁸⁰ [Historic England \(2022\) Search the List \[online\]](#)

⁸¹ [Ministry of Housing, Communities and Local Government \(2019 update\) National Planning Policy Framework \[online\]](#)

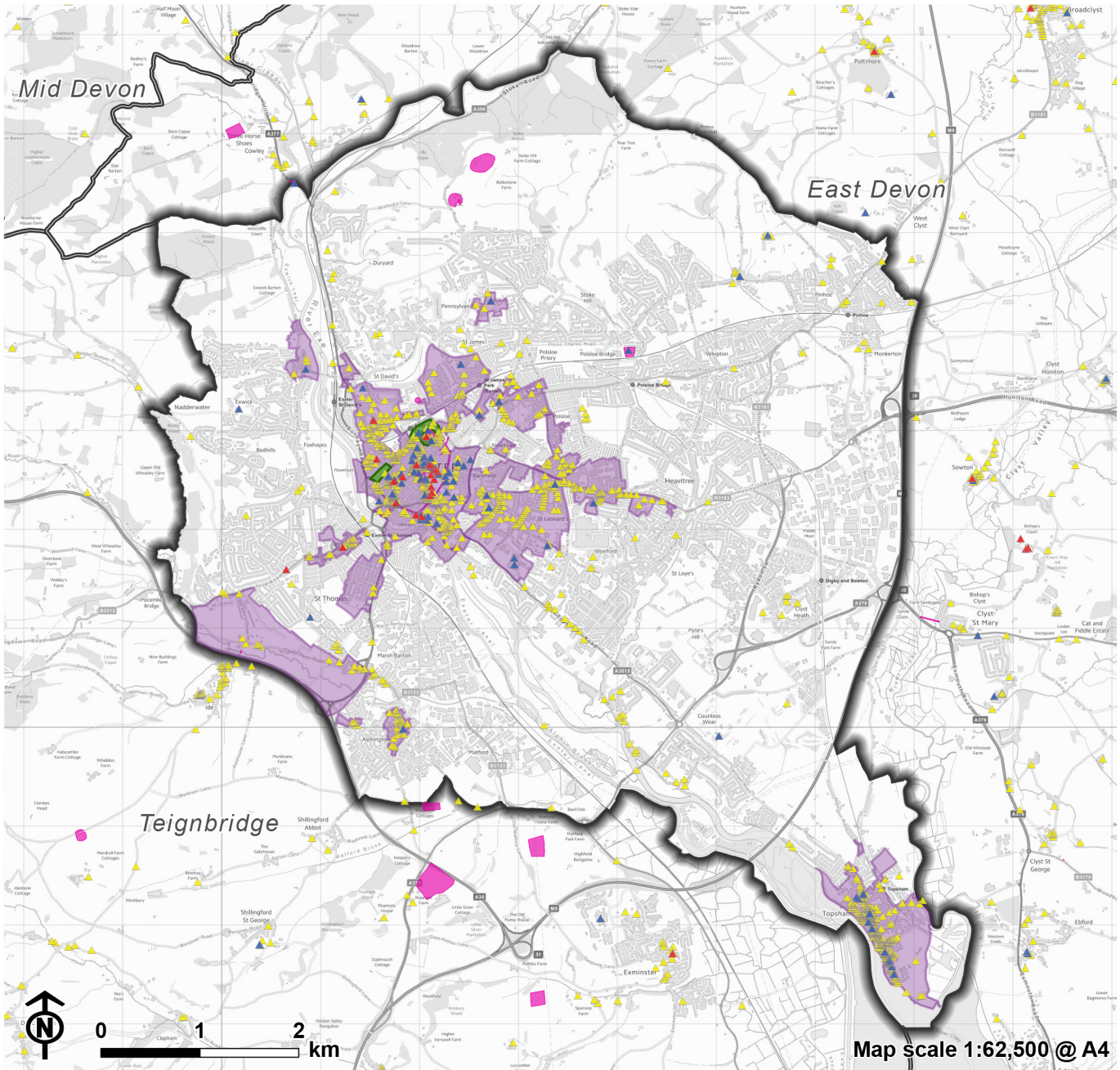
⁸² [Historic England \(2021\) Heritage at Risk South West Register 2021 \[online\]](#)

Appendix C
Baseline Information

Exeter Plan: Outline Draft Plan Consultation
September 2022

Designated Site	Category	Condition
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 assessment⁸³.

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**)⁸⁴ 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 heath⁸⁵.

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 City⁸⁶.

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.

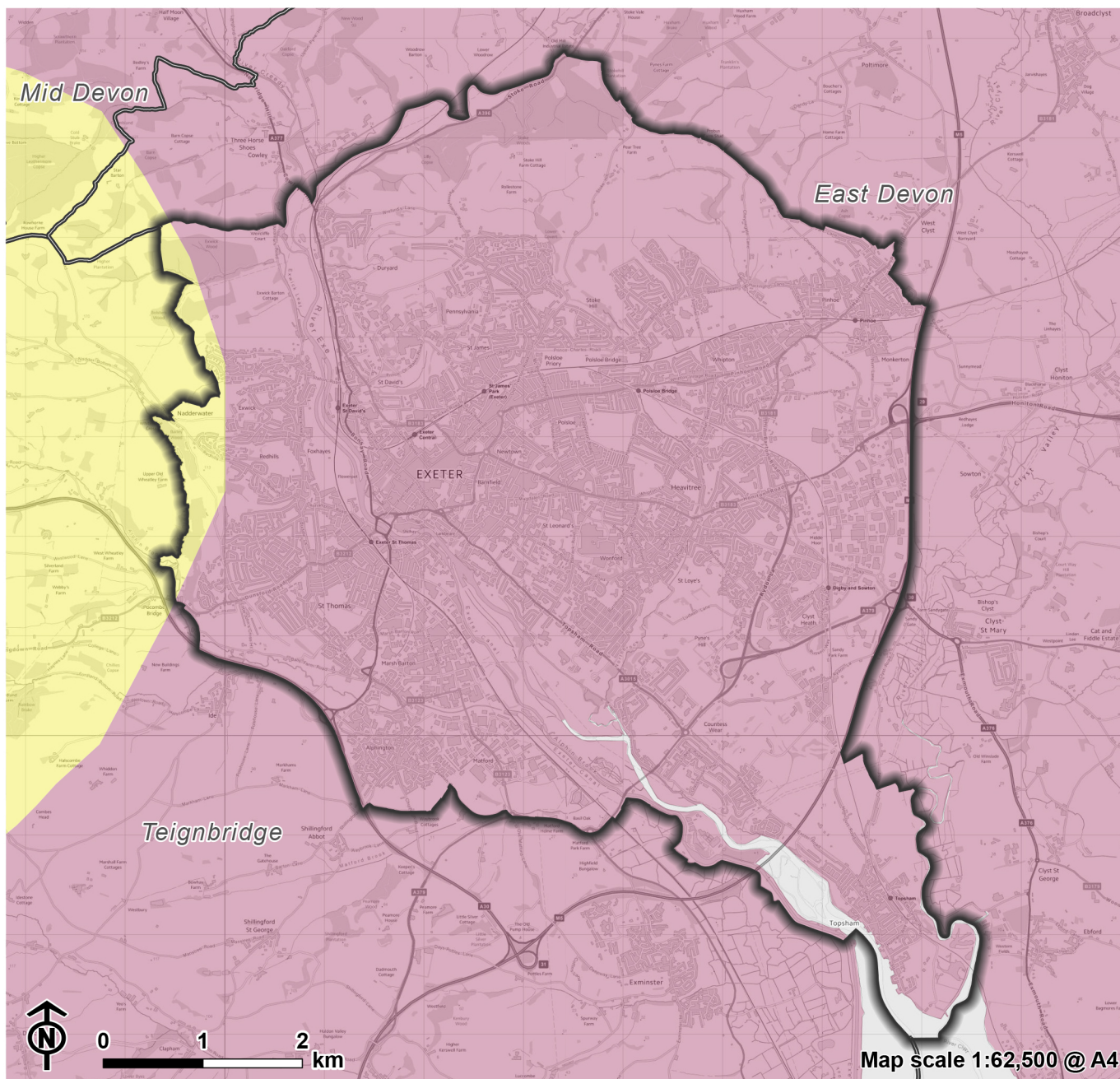
⁸³ [Devon County Council \(undated\) Devon's landscape character assessment \(DLCA\) \[online\]](#)

⁸⁴ [Natural England \(2014\) National Character Area profiles \[online\]](#)

⁸⁵ [Natural England \(2013\) NCA Profile: 148: Devon Redlands \(NE425\) \[online\]](#)

⁸⁶ [Exeter Fringes Landscape Sensitivity and Capacity Study \(2007\)](#)

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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 Agreement⁸⁷.

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 Exeter⁸⁸:

- 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 agenda⁸⁹.

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 UK⁹⁰.

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%

⁸⁷ United Nations Treaty Collection (2016) Paris Agreement
⁸⁸ Tyndall Centre (2022) [Setting Climate Commitments for Exeter: Quantifying the implications of the United Nations Paris Agreement for Exeter \[online\]](#)

⁸⁹ [Exeter City Council \(2020\) Authority Monitoring Report: 2020/21 Monitoring Report \[online\]](#)

⁹⁰ Met Office: State of Climate Report 2021

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 statistics⁹¹. Emissions for Exeter between 2005-2020 have fallen from 7.8t per capita to 2.8t per capita. Emissions in the plan area fell most years between 2005 and 2020 as shown in **Table C.11**.

Table C.11: Carbon dioxide emissions estimates in Exeter 2005-2020

Year	Total Emissions (kt CO ₂)	Per Capita Emissions (t)
2005	885.3	7.8
2006	692.1	6.1
2007	672.9	5.9
2007	695.2	6.1
2009	615.7	5.4
2010	640.9	5.5
2011	577.3	4.9
2012	627.6	5.3
2013	613.9	5.1
2014	550.3	4.5
2015	586.7	4.7
2016	483.2	3.8
2017	447.8	3.5
2018	443.6	3.4
2019	414.1	3.2
2020	375.2	2.8

C.108 The greatest drop in carbon dioxide emissions between 2005 and 2020 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 2020

Source of Emissions	2005	2020
Industry (kt)	135.5	51.7
Commercial (kt)	211.5	54.1
Public Sector (kt)	178.0	46.8
Domestic (kt)	230.0	129.2
Transport (kt)	132.8	90.0
Agriculture (kt)	1.9	8.1
Grand Total (kt)	885.3	375.2

C.109 In 2020 transport was still the largest source of carbon dioxide in the UK, accounting for 28% of total end-user greenhouse gas emissions. National transport greenhouse gas emissions saw a decrease of 18% in 2020 compared to 2019, 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 transport⁹². Transport emissions include freight and passenger transport, both for private and business purposes. In the UK, transport CO₂ emissions saw a decrease of 1.8% in 2019 compared to 2018. CO₂ emissions in Devon are dominated by transport emissions (40%), 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 January 2020, there were 28,375 public electric vehicle

⁹¹ [Department for Business, Energy and Industrial Strategy \(2022\) UK local authority and regional greenhouse gas emissions national statistics, 2005 to 2020 \[online\]](#)

⁹² ONS on behalf of Department for Business, Energy and Industrial Strategy (2020) 2019 UK greenhouse gas emissions, provisional figures

charging devices available in the UK and of these, 5156 were rapid charging devices⁹³. Within Exeter, there are a total of 55 public electric vehicle charging devices of which nine are rapid charging devices. This equates to 41.3 public electric vehicle charging devices per 100,000 population in Exeter and 6.8 rapid charging devices per 100,000 population. Exeter performs slightly less well than the UK averages of 42 public electric vehicle charging devices per 100,000 population and 7.7 rapid charging devices per 100,000 population. Currently, uptake of electric vehicles in Exeter has been lower than the national average.

Overall Energy Consumption

C.112 The Department for Business, Energy and Industrial Strategy produced the following consumption figures for Exeter in 2019⁹⁴:

- All fuels – A total of 172.1Ktoe across domestic, transport and industrial and commercial use.
- Coal – A total of 0.4Ktoe predominantly through industrial and commercial use.
- Manufactured fuels – A total of 0.7Ktoe through domestic and industrial and commercial use.
- Petroleum – A total of 38.2Ktoe predominantly from road transport.
- Gas – A total of 77.4Ktoe predominantly through domestic use.
- Electricity – A total of 47.6Ktoe through domestic and industrial and commercial use.
- Bioenergy and wastes – A total of 7.8Ktoe 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 2019.

Table C.13: Energy consumption in Exeter by type

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2019)
Coal	0.5	0.4
Manufactured Fuels	0.8	0.7
Petroleum	39.2	38.2
Gas	187.1	77.4
Electricity	50.9	47.6
Bioenergy and Wastes	2.2	7.8
Total	280.7	172.1

Flood Risk

C.114 Exeter City Council prepared a Strategic Flood Risk Assessment (SFRA), Level 1 published in 2008 and Level 2 in 2014⁹⁵. 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 Assessment⁹⁶ 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.

⁹³ [Department for Transport \(2022\) Electric vehicle charging device statistics: January 2022 \[online\]](#)

⁹⁴ [Department for Business, Energy and Industrial Strategy \(2021\) Total final energy consumption at regional and local authority level: 2005 to 2019 \[online\]](#)

⁹⁵ [Exeter City Council \(2021\) Current evidence base: 6. Strategic Flood Risk Assessment \(SFRA\) \[online\]](#)

⁹⁶ [Exeter City Council \(2008\) Strategic Flood Risk Assessment Final Report \[online\]](#)

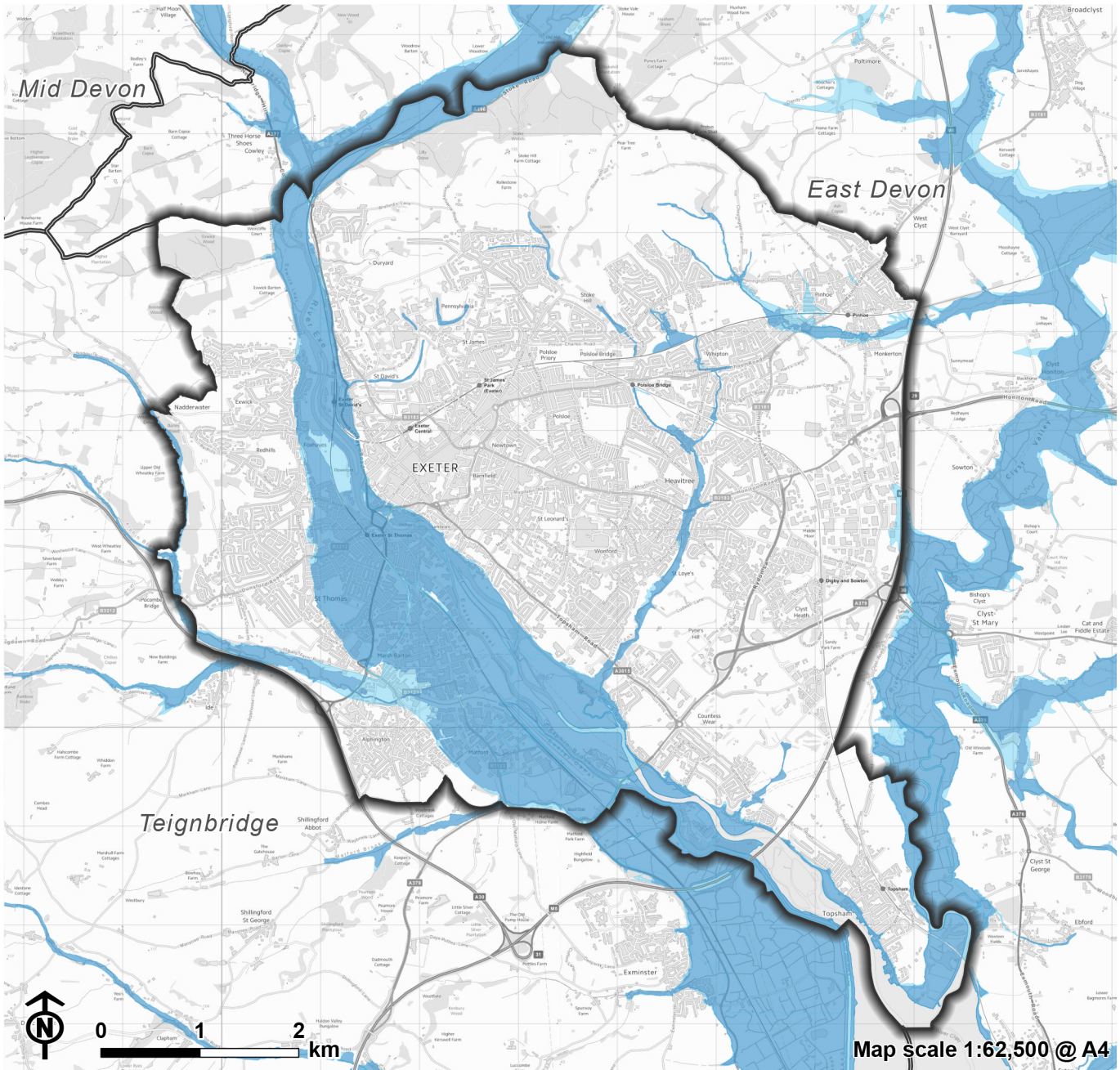
C.116 Some areas at risk of flooding within Exeter City already have man-made defences (such as raised walls, embankments, flood channels and storage areas) that can act to decrease flood risk in vulnerable areas. These structures are generally located close to the main rivers and watercourses where flood relief or alleviation schemes have been previously carried out to specific design criteria and are the responsibility of the Environment Agency⁹⁷.

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).

⁹⁷ [Exeter City Council \(2008\) Strategic Flood Risk Assessment Final Report \[online\]](#)

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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 capacity⁹⁸. 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 2020-21, which states that:

- Small scale renewable energy installations, such as domestic rooftop photovoltaic arrays, have come forward in the City; and
- A major renewable energy scheme in the City is the Exeter City Council Solar Farm. In 2020/21 works progressed in the development of a 1.2 MW ground mounted solar array co-located with energy storage technology, a battery with a separate connection (private wire) to provide a renewable energy supply to the Council's nearby Operations Depot in Exton Road.

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 locations⁹⁹.

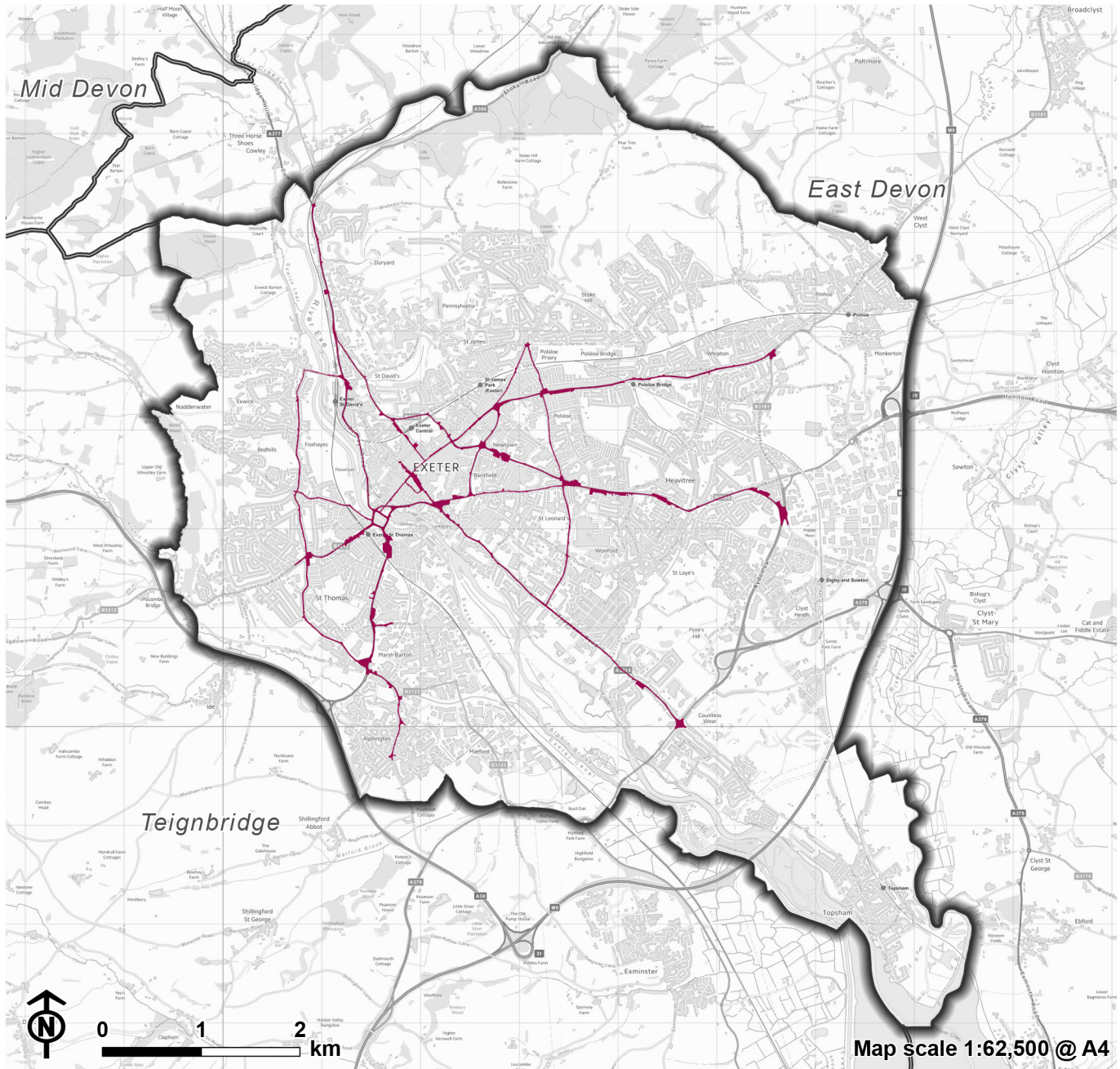
C.125 Nitrogen dioxide levels in Exeter at most monitoring sites have fallen since a peak in 2009 but have been broadly stable in the four years prior to 2020. 2020 was exceptional, as the reduction in traffic flows as a result of COVID-19 led to a significant fall in nitrogen dioxide concentrations at all monitoring sites. Concentrations were expected to rise again in 2021 so no changes to the AQMA have been proposed at this stage.

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.

⁹⁸ [Department for Business, Energy and Industrial Strategy \(2014, updated 2021\) Regional Renewable Statistics \[online\]](#)




⁹⁹ [Exeter City Council \(2021\) 2021 Air Quality Annual Status Report \(ASR\) \[online\]](#)

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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 1.30 am 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 pollution¹⁰⁰.

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:

¹⁰⁰ [Campaign to Protect Rural England \(undated\) Night Blight: Mapping England's light pollution and dark skies \[online\]](#)

- 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 minerals¹⁰¹.

C.137 The Devon Local Aggregate Assessment conducted between 2019 and 2020 details the current and predicted supply of aggregates to meet expected need. The three year average for crushed rock and sand and gravel fell below the ten year average for the first time in recent years. 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. Despite the COVID-19 pandemic, sales of secondary aggregates increased by 2% in 2020 from the 2019. Sales of marine and recycled aggregates in 2020 dropped from 2019. Sales of marine aggregates remained very low in 2020¹⁰².

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'.

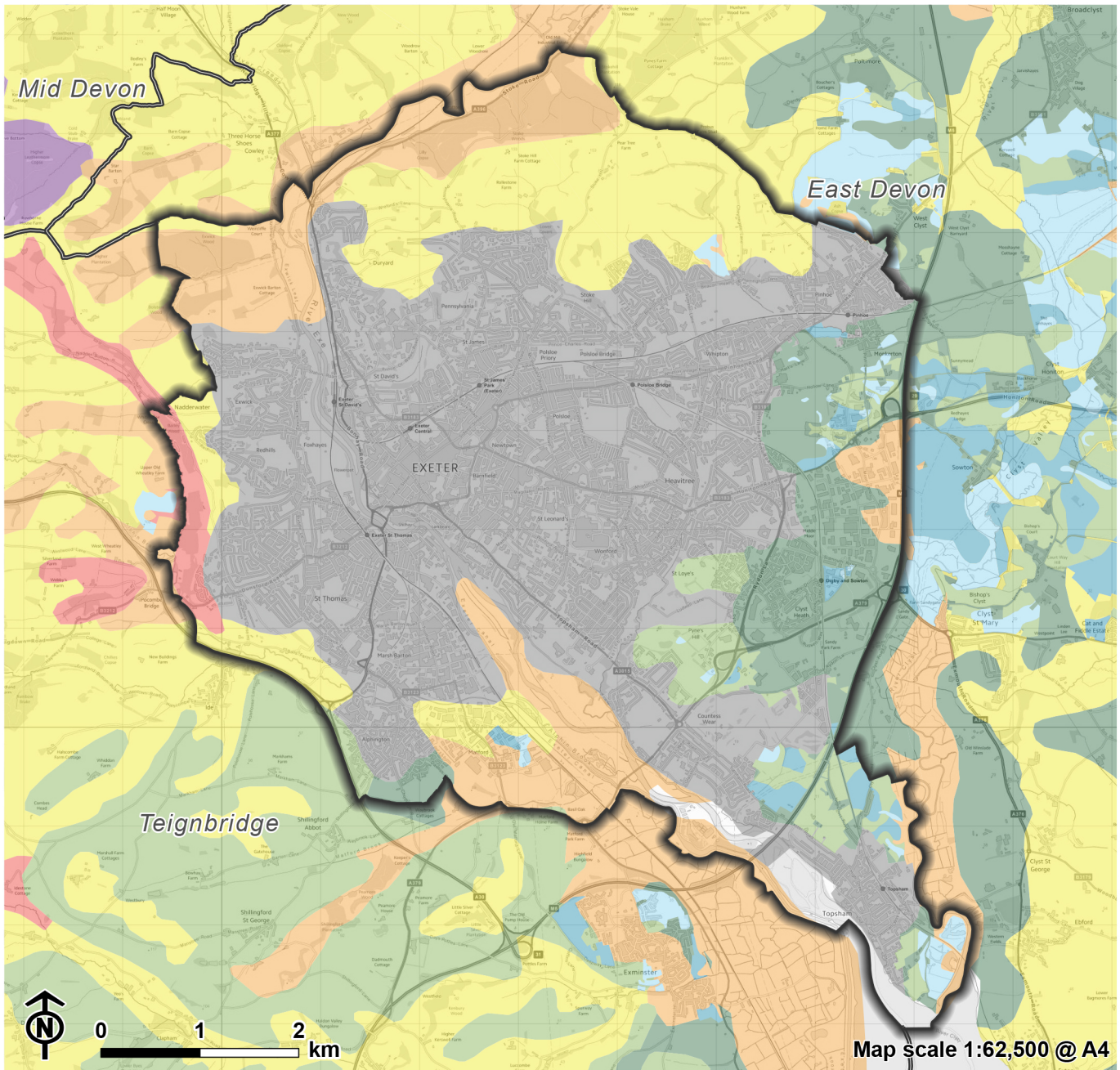
C.141 The main threats to soil quality in Devon relate to land in natural, countryside or agricultural uses, and include erosion by flooding and surface water runoff, intensive cultivation, poor forestry practice and trampling by grazing animals. These threats fall largely outside of the control of the 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**).

¹⁰¹ [Devon County Council \(2011\) Devon Mineral Plan 2011-2033 Adopted February 2017 \[online\]](#)

¹⁰² [10th Devon Local Aggregate Assessment 2011-2020 Adopted August 2021 \[online\]](#)

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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, 1200 sites have been identified in Exeter City where there may be contamination sources, through strategic inspection¹⁰³. 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.

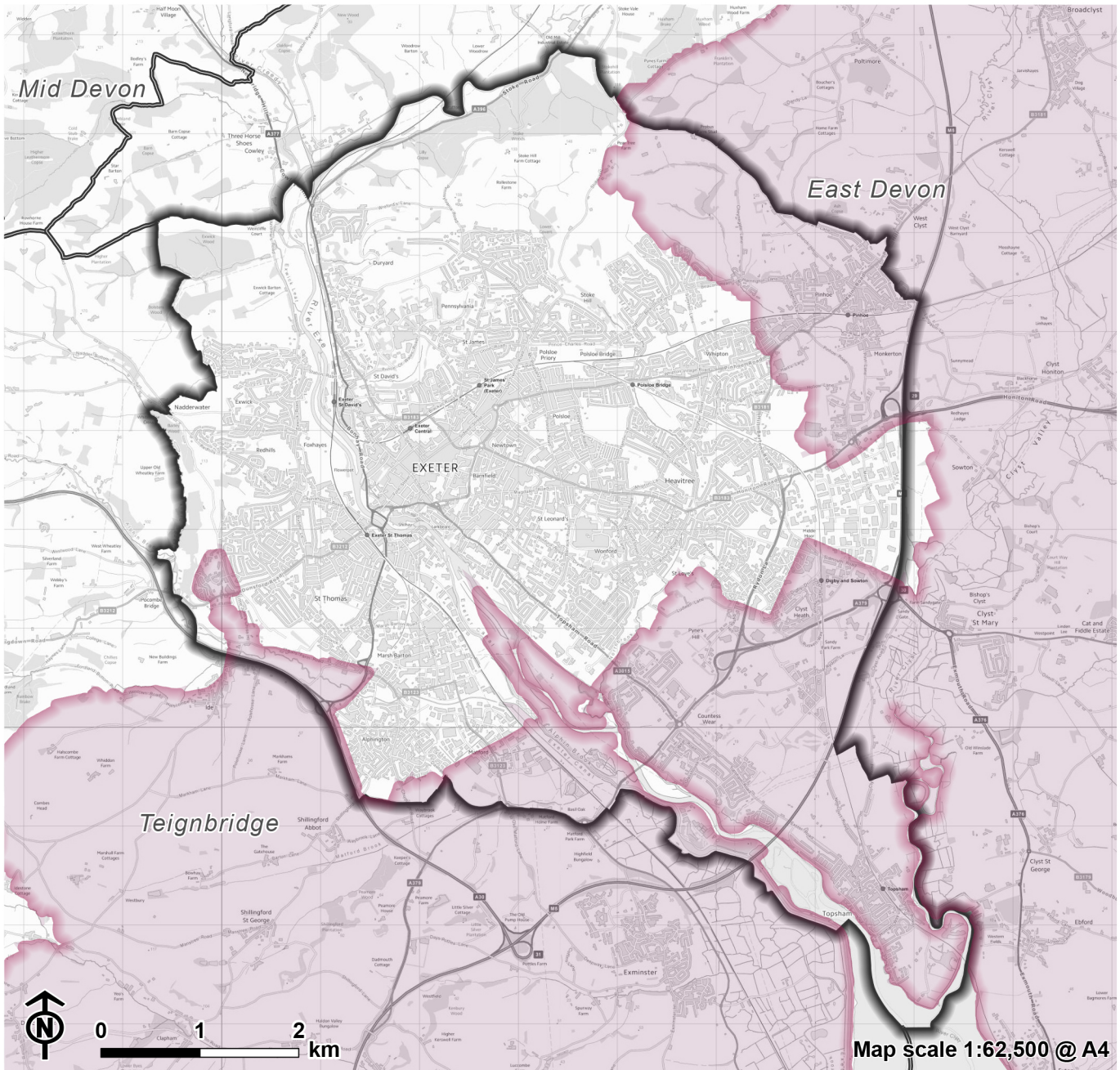
C.153 Groundwater quality varies across Devon. The majority of the county has poor chemical status with pockets of good. Generally in Exeter and neighbouring authorities, groundwater sources such as springs, wells and boreholes are limited and account for only about 10% of water supplies. These are located mainly in East Devon, and there are therefore a very

¹⁰³ [Exeter City Council \(2014\) Environmental Health and Licensing: Contaminated Land Strategy 2014-2019 \[online\]](#)

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 Otterton¹⁰⁴. Human health is not at risk from these sources because Southwest Water provide extra treatment.




¹⁰⁴ [Environment Agency \[online\]](#)

CB: EB: Tembo_L LUC 11938_Exeter_MainReportMaps_Pollution_ALC_Other_v3 02/08/2022 Source: NE



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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 areas¹⁰⁵.

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 2019/20¹⁰⁶. 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 performance¹⁰⁷.

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:

- Some of the data which is available at the national and district/City level is based on the reporting of 2011 census. This data allows for comparisons to be made between the City and national performance in relation to a number of indicators; however it is recognised that data is now relatively old considering the timings of the national census.
- 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.
- Apart from sampling point data¹⁰⁸, 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.

¹⁰⁵ [Devon County Council \(2014\) Devon Waste Plan 2011-2031 \[online\]](#)

¹⁰⁶ [Devon County Council \(2021\) Resource and Waste Management Strategy for Devon and Torbay 2020-2030 \[online\]](#)

¹⁰⁷ [Devon Authorities Strategic Waste Committee \(2020\) Waste Performance Statistics 2019/20 \[online\]](#)

¹⁰⁸ [Environment Agency \(undated\) Water Quality Archive: Search sampling points \[online\]](#)

Appendix D

Site Assessment Criteria

Assumptions Regarding Distances

D.1 A number of the appraisal assumptions presented in this appendix refer to accessibility from site options to services, facilities, employment etc. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation¹⁰⁹ 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

¹⁰⁹ [The Institution of Highways and Transportation \(2000\) Guidelines for Providing for Journeys on Foot \[online\]](#)

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 1.8km of a railway station are likely to have a significant positive (++) effect.
- Sites that are more than 1.8km from a railway station but within 450m of a bus stop are likely to have a minor positive (+) effect.
- Sites that are more than 1.8km from a railway station and more than 450m from a bus stop but which have a cycle path within 450m are likely to have a negligible (0) effect.
- Sites that are more than 1.8km from a railway station and more than 450m from a bus stop and cycle route 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

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Exeter Plan: Outline Draft Plan Consultation
September 2022

Table E.1: Exeter City Council's reasons for selecting or rejecting reasonable alternative site options

Site Option	Site Name	Proposed as an Allocation in the Exeter Plan?	Council's Main Reasons for Decision-Making
Residential site options			
2	Landing lying east of St Andrews Road	No	Site is at an unacceptable risk of flooding.
4	Land at Redhills (North), Exwick Lane, Exeter	No	Site already has planning consent for residential development.
5	Land at Lugg's Farm, Redhills (South), Exeter	No	Site would have an unacceptable landscape impact.
7	Merrivale Road	No	Availability of site not determined.
9	Flowerpot Lane Car Park, Flowerpot Lane	No	Deliverability of site subject to the production of a Car Parking strategy in the future.
10	Okehampton Street Car Park, Okehampton Street, Exeter	No	Deliverability of site subject to the production of a Car Parking strategy in the future.
11	Land at Ide House	No	Site is partially in the Barley Valley park and would have an unacceptable landscape impact.
13	Land at Taunton Close	No	Availability of site not determined.
17	Land at Shillingford Road, Exeter	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	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	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	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	Site is unsuitable due to steep topography and unsuitable highways access.

Appendix E
Council's Reasons for Selecting or Rejecting Site Options

Exeter Plan: Outline Draft Plan Consultation
September 2022

Site Option	Site Name	Proposed as an Allocation in the Exeter Plan?	Council's Main Reasons for Decision-Making
24	99 Howell Road, Exeter	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
25	Bystock Terrace Car Park, Queens Terrace, Exeter	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	Site is suitable, available and achievable and in accordance with the development strategy.
27	Wynford Road	No	Availability of site not determined.
30	Beacon Lane Garages	No	Availability of site not determined.
31	Lancelot Road	No	Availability of site not determined.
33	Land off Spruce Close, Exeter	No	Site already has planning consent for residential development.
36	Woolsgrove, Church Hill	No	Site would have an unacceptable landscape impact
37	Land at Home Farm	No	Site would have an unacceptable landscape impact.
41	Land between St Annes Well Brewery and Exeter College, Lower North Street, Exeter	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	Site is included as part of the wider North Gate allocation ref 42.
44	Mecca Bingo, 12 North Street, Exeter	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	Deliverability of site subject to the production of a Car Parking strategy in the future.
47	Cathedral and Quay Car Park, Lower Coombe Street, Exeter	No	Site is included as part of the wider South Gate allocation ref 46.
48	Magdalen Street Car Park, Exeter, Devon	No	Site is included as part of the wider South Gate allocation ref 46.

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Site Option	Site Name	Proposed as an Allocation in the Exeter Plan?	Council's Main Reasons for Decision-Making
49	Land at New North Road, Exeter	No	Unsuitable due to impact on conservation area and historic park and garden.
50	Howell Road Car Park, Howell Road, Exeter	No	Deliverability of site subject to the production of a Car Parking strategy in the future.
51	12-31 Sidwell Street, Exeter	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
54	Triangle Car Park, Russell Street, Exeter	No	Site is included as part of the wider East Gate allocation ref 52.
55	Pyramids Leisure Centre, Heavitree Road, Exeter	No	Site is included as part of the wider East Gate allocation ref 52.
56	Parr Street Car Park, Parr Street, Exeter	No	Deliverability of site subject to the production of a Car Parking strategy in the future.
58	Fairbanks, 90 Polsloe Road, Exeter	No	Site would result in the unacceptable loss of a community facility.
60	Land at Hamlin Lane, Exeter	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	Site already has planning consent for residential development.
63	Clifford Close, Exeter	No	Availability of site not determined.
66	Land at Cumberland Way, Exeter	No	Site already has planning consent for residential development.
67	Grenadier Emperor, Grenadier Road	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	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	Deliverability of site subject to the production of a Car Parking strategy in the future.
70	Land known as Mount Radford Lawn	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	Deliverability of site subject to the production of a Car Parking strategy in the future.

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72	Belle Isle Depot, Belle Isle Drive, Exeter	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
73	91-97 Wonford Street	No	Availability of site not determined.
75	Chestnut Avenue	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
76	Bishop Westall Road	No	Availability of site not determined.
77	Land off Ringswell Avenue	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	Site would result in the loss of a key park and ride facility.
80	Former overflow car park Tesco Store, Russell Way	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
81	Land Adjacent Tesco Store, Russell Way, Exeter.	No	Site is not suitable due to presence of protected trees and steep topography.
82	Russell Way, Exeter.	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	Site is suitable, available and achievable and in accordance with the development strategy.
85	Land to the east side of Glasshouse Lane, Exeter	No	Availability of site not determined.
86	Wear Barton Playing Fields, Wear Barton Road, Exeter	No	Site is unsuitable due to the loss of playing pitches and open space
91	Land at Newcourt Road, Topsham	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
92	Land east of Newcourt Road, Topsham	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
93	Yeomans Gardens, Newcourt Road, Topsham	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
94	Land west of Newcourt Road, Topsham	Yes	Site is suitable, available and achievable and in accordance with the development strategy.

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95	Land at Topsham Golf Academy	No	Site is unsuitable due to the loss of a sports facility.
96	Land at Clyst Road, Topsham	No	Site would have an unacceptable landscape impact.
98	Land on the south side of Monmouth Street, Topsham	No	Site would have an unacceptable landscape impact.
99	Mount Howe Field Topsham	No	Site is unsuitable due to unacceptable landscape impact and flood risk.
100	Fever & Boutique, 12 Mary Arches Street, Exeter	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	Site already has planning consent for residential development.
103	Clarendon House, Western Way, Exeter	No	Site is included as part of the wider East Gate allocation ref 52.
105	Honeylands, Pinhoe Road	No	Site already has planning consent for an older persons care home.
106	Land lying east of Pinn Lane, Exeter	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	Site is in conflict with the adopted Monkerton Hill Barton masterplan including the proposed Monkerton Ridge Park.
108	Hessary, Hollow Lane, Exeter	No	Site is in conflict with the adopted Monkerton Hill Barton masterplan including the proposed Monkerton Ridge Park.
110	88 Honiton Road, Exeter	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
112	DOA & Exeter Mobility Centre, Wonford Road	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	Site already has planning consent for residential development.
115	Land at Retreat Drive, Topsham	No	Site already has a residential planning application with a resolution to approve consent.

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118	Links House, 156 Grace Road Central, Marsh Barton, Exeter	No	Site is included as part of the wider Marsh Barton allocation ref 14.
119	Falcon House, Falcon Road, Exeter	No	Site is included as part of the wider Sandy Gate allocation ref 89.
120	22 Marsh Green Road, Exeter	No	Site is included as part of the wider Marsh Barton allocation ref 14.
122	1-9 Alpin Brook Road, Exeter	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	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	Site is included as part of the wider Marsh Barton allocation ref 14.
125	Land behind 66 Chudleigh Road, Exeter	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.
Mixed use site options			
1	Hamlyns Farmhouse & Hamlyns Farm, St Andrews Road	No	Site lacks suitable highway access and would have an unacceptable landscape impact.
6	Land on the west side of Barley Lane, Exeter	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	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	Site is suitable, available and achievable and in accordance with the development strategy.
15	Water Lane	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
16	Haven Banks Retail Park, Water Lane, Exeter	No	Site is included as part of the wider Water Lane allocation ref 15.
22	Red Cow / St Davids	Yes	Site is suitable, available and achievable and in accordance with the development strategy.

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28	Land north of Exeter	No	Site is within the Mincinglake Valley Park, has unsuitable highways access and would have an unacceptable landscape impact.
29	Land at Pendragon Road, Exeter	No	Site is within the Mincinglake Valley Park and would have an unacceptable landscape impact.
34	Gray's Barn, Church Hill, Exeter	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	Site is suitable, available and achievable and in accordance with the development strategy.
40	Exbridge House, 26 Commercial Rd, Exeter	No	Site is included as part of the wider West Gate allocation ref 39.
42	North Gate	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
46	South Gate	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
52	East Gate	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
53	City Point	No	Site is included as part of the wider East Gate allocation ref 52.
64	Whipton Community Hospital, Hospital Lane, Exeter	No	Unsuitable due to being an existing hospital.
83	Land at St Bridget Nurseries, Old Rydon Lane	Yes	Site comprises a previous allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
88	Land at Seabrook Farm, Topsham	No	Site already has planning consent for residential development.
89	Sandy Gate	Yes	Site is suitable, available and achievable and in accordance with the development strategy.
90	Land at Sandy Park	No	Part of site is included as part of the wider Sandy Gate allocation ref 8.9 Rem. Site already has a residential planning application with a resolution to approve.
97	Land to the east of Clyst Road, Topsham	No	Site would have an unacceptable landscape impact.
102	Civic Centre, Paris Street	No	Site is included as part of the wider East Gate allocation ref 52

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104	Former Police Station and Central Devon Magistrates' Court, The Court House, Heavitree Road, Exeter	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	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	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.
113	Land south of the A379, Exeter	Yes	Site comprises a previous allocation in the core strategy. It is suitable, available and achievable and in accordance with the development strategy.
116	Land at Water Lane	No	Site is included as part of the wider Water Lane allocation ref 15.
117	Isca House, Haven Road, Exeter	No	Site is included as part of the wider Water Lane allocation ref 15.
121	RGB Exeter, Alphinbrook Road, Marsh Barton, Exeter	No	Site is included as part of the wider Marsh Barton allocation ref 14.
126	Aldens Farm West, Alphington	No	Site already has planning consent for residential development.