

Exeter City Council

Exeter Plan: Outline Draft Plan Consultation Sustainability Appraisal: Non-Technical Summary

Final report
Prepared by LUC
September 2022





Exeter City Council

Exeter Plan: Outline Draft Plan Consultation

Sustainability Appraisal: Non-Technical Summary

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Chapter 1

Non-Technical Summary

Introduction

- **1.1** This Sustainability Appraisal Report: Non-Technical Summary relates to the SA of the Exeter Plan, which is being prepared by Exeter City Council. It relates to the Outline Draft Plan consultation document (August 2022). The Plan sets out the vision and objectives for Exeter, as well as the policies that are required to deliver that vision over the Plan period to 2040.
- **1.2** Plans and strategies such as the Exeter Plan are subject to a process called Sustainability Appraisal (SA), which assesses the likely effects of a plan on social, economic, and environmental issues. This Non-Technical Summary relates to the full SA Report, which is being published for public consultation.
- **1.3** The Outline Draft version of the Exeter Plan has been prepared following a consultation on a high level 'Issues' paper between September and November 2021. Responses to this consultation have been used to inform the current document.

Sustainability Appraisal

- 1.4 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to SA. SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development.
- 1.5 SEA is also a statutory assessment process, required by the SEA Regulations¹. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment. The Government advises that a joint SA and SEA process can be carried out by producing an SA Report which incorporates the requirements of the SEA Regulations. This approach is being taken to the SA/SEA of the Exeter Plan and the process is referred to for ease as simply 'SA'.
- **1.6** The SA is being undertaken in stages alongside the preparation of the Exeter Plan in order to provide sustainability

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

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The Environmental Assessments and Miscellaneous Planning

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guidance as the plan is developed. The approach that has been taken to the SA of the Exeter Plan to date is described below.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

1.7 The SA process began in March 2022 with the production of a Scoping Report for the Exeter Plan. The Scoping Report determined what the SA should cover by reviewing a wide range of relevant policy documents and examining data to help identify what the key sustainability issues are in Exeter City, as well as likely future trends. This work helped to inform the development of a set of sustainability objectives (referred to as the 'SA framework') against which the effects of the plan would be assessed. The SA framework is presented further ahead in this Non-Technical Summary.

Stage B: Developing and Refining Options and Assessing Effects

1.8 Developing options for a plan is an iterative process, usually involving a number of consultations with stakeholders and the public. The SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for the policies and site allocations to be included in a plan. The reasonable alternative options that have been considered for the Exeter Plan to date have included alternative spatial approaches, policy approaches and potential sites for new housing and mixed-use development, as described below.

Spatial Approaches

- **1.9** Exeter City Council has considered four alternative spatial approaches for the Exeter Plan:
 - 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.
- **1.10** These were originally appraised by LUC in June 2022 and the findings provided to the Council in the form of an internal summary note. This internal summary note now forms the basis for Chapter 4 of the full SA Report, with the findings also summarised later in this Non-Technical Summary.
- **1.11** No reasonable alternative options for the amount of development have been considered in the SA as the Council is considering an evidence-based quantum of growth and does not consider there are reasonable alternative options for higher or lower quanta.

Policy Options

1.12 As part of the production of the full SA Report to accompany the Outline Draft Plan, the objectives and policies contained within the Plan were appraised, with the findings presented in Chapter 6 of the full SA Report and summarised in this Non-Technical Summary.

Site Options

1.13 In June 2022, LUC appraised a number of reasonable alternative options for residential and mixed use site allocations, the findings of which were provided to the Council in the form of an internal summary note. This internal summary note also now forms the basis for Chapter 5 of the full SA Report, with the SA findings for the site options also summarised later in this Non-Technical Summary.

Stage C: Preparing the SA Report

1.14 The full SA Report describes the process that has been undertaken to date in carrying out the SA of the Exeter Plan and sets out the SA findings for the Outline Draft Plan. 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 possible.

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

1.15 Exeter City Council is inviting comments on the full SA Report and this Non-Technical Summary, as well as on the Outline Draft Plan itself. These documents are being published on the Council's website for a period of representation between September and November 2022.

Stage E: Monitoring Implementation of the Local Plan

1.16 Recommendations for monitoring the sustainability effects of implementing the Exeter Plan are included in Chapter 7 of the full SA Report and are described later in this Non-Technical Summary.

Policy Context

- **1.17** There are a large number of plans and programmes that could be relevant to the preparation of the Exeter Plan. In particular, the Plan must adhere to national planning policy as set out in the National Planning Policy Framework (NPPF).
- **1.18** The Exeter Plan should provide a spatial expression of other plans and programmes where relevant, to assist in their implementation. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level. In line with the requirements of the SEA Regulations, relevant

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international, national, regional, sub-regional and local plans have been reviewed in detail in relation to their objectives, targets and indicators and their implications for the Exeter Plan and the Sustainability Appraisal. The full review can be seen in Chapter 3 and Appendix B of the full SA Report.

- **1.19** 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."
- **1.20** The NPPF sets out information about the purposes of local plan-making, stating that plans should:
 - "Be prepared with the objective of contributing to the achievement of sustainable development;
- Be prepared positively, in a way that is aspirational but deliverable;
- Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- Be accessible through the use of digital tools to assist public involvement and policy presentation; and
- Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area."
- **1.21** The NPPF also requires Local Plans to be 'aspirational but deliverable'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however, significant adverse impacts in any of those areas should be avoided.
- **1.22** The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
 - "Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- Community facilities (such as health, education and cultural infrastructure); and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."
- **1.23** The NPPF also promotes well-designed places and development, and plans should "at the most appropriate level, set out a clear design vision and expectations".
- **1.24** Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design of places, landscapes, and development.

Baseline Information and Key Sustainability Issues

- 1.25 In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in Exeter. Detailed baseline information for the City is presented in Chapter 3 and Appendix C of the full SA Report. As well as environmental issues, the baseline information includes a description of social and economic issues in Exeter.
- **1.26** The baseline information contributed to the identification of a set of key sustainability issues for Exeter City, which in turn helped to develop a locally appropriate SA framework (i.e. a set of SA objectives) to be used in appraising the emerging Exeter Plan. The key sustainability issues for the City are set out below. In line with the requirements of the SEA Regulations, consideration has been given to the likely evolution of the environment in Exeter if the Exeter Plan were not to be implemented (see Chapter 3 of the full SA Report). In general, the adopted development plan for Exeter contains policies which set out requirements that will help to address the key sustainability issues for the plan area. In the absence of the new Exeter Plan, the requirements of these policies along with national planning policy would continue to help limit the most adverse effects in relation to these issues. However, without the Exeter Plan, development is more likely to come forward at less sustainable locations in the City given changing circumstances and the emergence of more up to date evidence since the adoption of the current development plan. The new Exeter Plan presents an opportunity to include updated policies to better address the trends observed across these key sustainability issues. It also presents an opportunity to respond positively to issues of importance on the national stage such as climate change, biodiversity and health and wellbeing as well as ensuring that the housing and employment needs of local people are met.

Table 1.1: Key sustainability issues for Exeter City

Topic	Key Issues
Population, Health and Wellbeing	Housing is a big issue, particularly with the housing market in Exeter being expensive and residents struggling to afford homes. There is a current imbalance between the supply and demand resulting in a lack of affordability of homes. There is a need for a mix of housing types that cater for the needs of a range of people.
	There is also an increasing need for primary provision and secondary education in future years due to a significant increase in births and migration into the City in recent years.
	There are inequalities related to life expectancy and overall deprivation within Exeter which could be exacerbated by the COVID-19 pandemic.
Open Spaces and Recreation	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.
Crime and Safety	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.
Economy	Exeter has a low business density due to a dominance of larger employers.
	Uncertainty exists over what the economic impacts of Britain's exit from the EU and the COVID-19 pandemic will be.
Transport	Exeter continues to see rising levels of inward commuting, with travel behaviour for commuters outside the City predominantly being by car.
Biodiversity	There is a risk of Exeter's sensitive biodiversity sites being harmed by inappropriate development, increased activity and increased urbanisation impacts.
Heritage Assets	Poorly planned development could adversely affect some of Exeter's heritage assets.
Landscape	The landscape setting of the City could be adversely affected by inappropriate development.
Climate Change	Hotter, drier summers are expected as a result of ongoing and accelerating climate change, which have the potential for adverse effects on human health.
Mitigation and Adaptation	High flood risk in some areas particularly around the River Exe, which is expected to increase due to climate change.
	There are continued high CO2 emissions from transport.
Natural Resources	There are small areas of Grade 3 agricultural land, and small areas in the south east of Grades 1 and 2.
and Pollution	There is an Air Quality Management Area in Exeter, which was designated because the area exceeds set thresholds for nitrogen dioxide caused primarily by road traffic emissions. Development in close proximity to the AQMA could lengthen its status as an AQMA. Outside of the AQMA, although air quality may be within legal limits, there is still concern present in relation to air quality, particularly as a result of road congestion.
	Although in the most part, surface water quality is moderate to good across Devon, there is a small incidence of poor quality affecting parts of the Exe Estuary.

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Methodology and the SA Framework

1.27 The key sustainability issues for Exeter City fed into the identification of a set of SA objectives which are the main tool used at each stage of the SA for assessing the likely effects of options and draft policies in the Exeter Plan. The SA framework is presented below.

Table 1.2: SA framework for the Exeter Plan

SA Objective	Appraisal Questions	Relevant SEA Topic(s)			
To achieve net-zero emissions and support adaptation to unavoidable climate change	 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? 	■ Climate			
2: To provide a suitable supply of high quality housing including appropriate mix of types and tenures	 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? 	PopulationHuman HealthMaterial Assets			
3: To support sustainable and diverse growth of the City's economy and maximise employment opportunities	 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? 	PopulationMaterial Assets			

SA Objective	Appraisal Questions	Relevant SEA Topic(s)
4: Improve the physical 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	 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? Will the policy/option promote visually attractive development with high quality design, layout and appropriate and effective landscaping? 	 Population Human Health Material Assets Material Assets Landscape Cultural Heritage
6: To support community cohesion and safety	 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? 	■ Population ■ Human Health
7: To provide good access to services, facilities and education	 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? 	PopulationHuman HealthMaterial Assets
8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives	 Will the policy/option reduce reliance on private vehicles? Will the policy/option improve public transport links to key facilities within the City? 	Air Climate

SA Objective	Appraisal Questions	Relevant SEA Topic(s)			
	 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? 	PopulationHuman Health			
9: To protect residential amenity by reducing air, noise and light pollution	 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)? 	AirHuman Health			
10: To conserve and enhance biodiversity and geodiversity	 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? 	BiodiversityHuman Health			
11: To conserve and enhance the character and distinctiveness of the landscape	 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? 	LandscapeCultural Heritage			
12: To conserve and enhance the historic environment including the setting of heritage assets	 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? 	Cultural HeritageMaterial Assets			
13: To manage and reduce flood risk from all sources and to protect the	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?	WaterBiodiversity			

SA Objective	Appraisal Questions	Relevant SEA Topic(s)		
quality and quantity of water	Will the policy/option promote the use of SuDS and other flood resilient design?			
resources	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	Will the policy/option promote the re-use of previously development land?	Soil		
resources, including land, minerals and waste	Will the policy/option avoid development on higher quality agricultural land?	Material Assets		
	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?			

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Use of the SA Framework

1.28 Within the assessment matrices showing the likely sustainability effects of the Exeter Plan policy and site options, symbols and colour-coding have been used against each SA objective to show whether an effect is likely to be positive or negative, minor or significant, or uncertain, as shown in Table **1.3**. Where a potential positive or negative effect is uncertain, a question mark is added to the relevant symbol (e.g. +? or -?).

Table 1.3: Key to symbols and colour coding used in the SA of the Exeter Plan

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

Likely Effects of the Exeter Plan Options

1.29 The following sections set out the findings of the SA for the strategic approaches, site options and policies that were considered during the development of the Outline Draft Plan.

Strategic Policy Options

- **1.30** 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.
- **1.31** The likely effects of each option are summarised in Table 1.2 and are described in full in Chapter 4 of the full SA report.

Table 1.4: 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	+/-?		+/-?	+/-?

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Site Options

1.32 The Council considered 82 residential sites and 31 mixed-use sites, all of which were subject to SA. The likely effects of each residential and mixed-use site option are summarised in **Table 1.5** and **Table 1.6**, respectively and are described in more detail in Chapter 5 of the full SA report. A separate Annex to the SA report contains the detailed appraisal proformas for each site option.

Table 1.5: 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

SA1: Climate Change Change SA2: Housing SA3: Economic Growth SA5: Design and the Built Environment SA6: Community 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
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
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
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
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
56 Parr Street Car Park, Parr Street, Exeter 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
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
66 Land at Cumberland Way, Exeter 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/
73 91-97 Wonford Street 0 + 0 + +/-? ++ 0	0? 0?	?	-/0	++0
75 Chestnut Avenue 0 + +/? 0 + ++?/+ + 0	??	-?	0	-/0
76 Bishop Westall Road 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
77	Land off Ringswell Avenue	0	+	0	++	0	+	++?/-	++	0	0?	0?	-?	0	-/O
79	Park and Ride Site, Digby Drive	0	+	0	?/+	0	0	++?/-	++	0	?	0?	?	/0	++/0
80	Former overflow car park Tesco Store, Russell Way	0	+	0	+	0	0	-/+?	++	0	?	0?	?	0	++/0
81	Land Adjacent Tesco Store, Russell Way, Exeter.	0	+	0	+	0	0	-/-?	++	0	?	0	?	-/0	/0
82	Russell Way, Exeter.	0	+	0	+	0	0	-/+?	++	0	?	0?	?	/0	/0
84	Garages at Lower Wear Road	0	+	0	+	0	0	+/+?	++	0	?	0?	?	-/0	++/0
85	Land to the east side of Glasshouse Lane, Exeter	0	+	0	?/+	0	0	-/+?	++	0	?	0?	?	-/0	-/0
86	Wear Barton Playing Fields, Wear Barton Road, Exeter	0	+	0	?/+	0	0	-/+?	++	0	?	0?	?	0	-/0
91	Land at Newcourt Road, Topsham	0	+	0	+	0	0	-/+?	++	?/0	-?	-?	?	0	/0
92	Land east of Newcourt Road, Topsham	0	+	0	+	0	0	-/-?	++	0	-?	-?	?	0	/0
93	Yeomans Gardens, Newcourt Road, Topsham	0	+	0	+	0	0	-/-?	++	0	-?	-?	-?	0	/0
94	Land west of Newcourt Road, Topsham	0	+	0	?/+	0	0	+/-?	++	0	?	-?	?	-/0	/0
95	Land at Topsham Golf Academy	0	+	0	?/+	0	0	+/-?	++	0	?	-?	?	0	/0
96	Land at Clyst Road, Topsham	0	+	0	+	0	0	-/-?	++	0	?	-?	?	0	/0
98	Land on the south side of Monmouth Street, Topsham	0	+	0	++	0	0	+/-?	++	0	?	?	?	0	/0
99	Mount Howe Field Topsham	0	+	0	++	0	0	+/-?	++	0	?	?	?	0	/0
100	Fever & Boutique, 12 Mary Arches Street, Exeter	0	+	0	++	0	0	+/+?	++	/0	-?	0?	?	0	++/0
101	182-184, 185-186 Fore Street and 3-6 North Street, Exeter	0	+	0	++	0	0	+/+?	++	/0	-?	0?	?	0	++/0/
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

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
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
122	1-9 Alpin Brook Road, Exeter	0	+	?/0	++	0	0	-/+?	++	0	?	0?	?	/0	++/0
123	CP Arts, Alphin Brook Road, Marsh Barton Trading Estate, Exeter	0	+	?/0	+	0	0	-/-?	+	0	0?	0?	-?	/0	++/0
124	1-5 Elm Units, Grace Road South, Marsh Barton Trading Estate, Exeter	0	+	?/0	+	0	0	-/-?	+	0	?	0?	-?	/0	++/0
125	Land behind 66 Chudleigh Road, Exeter	0	+	0	++	0	0	-/-?	+	/0	0?	0?	?	/0	/0

Table 1.6: 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

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
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
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

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Objectives and Policies

1.33 The Outline Draft Plan contains 11 objectives, each of which covers one of the 11 topics by which the policies are grouped. The likely effects of the objectives and policies in the Outline Draft Plan are presented in **Table 1.7** overleaf. **Table 1.8**, which follows, summarises the likely cumulative effects of the Outline Draft Plan as a whole on each SA objective. The likely cumulative effects of the Plan are described in full in Chapter 6 of the full SA Report.

Table 1.7: 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

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 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
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	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?	+/-?

Table 1.8: 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

1.34 A number of recommendations were made in a draft version of the full SA Report. These are listed in the full SA report along with information about how the Council has responded to these recommendations.

Monitoring

1.35 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Local Plan. Suggested indicators for monitoring the potential significant sustainability effects of implementing the emerging Exeter Plan are set out below.

Table 1.9: Proposed SA monitoring framework for the Exeter Plan

SA Objectives	Indicators	Possible Data Sources					
To achieve net-zero emissions and support adaptation to unavoidable climate change	 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. 	 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	quality housing including priate mix of types and Net additional transit and residential pitches (Gypsy, Traveller and Travelling Showpeople) permitted and completed to meet identified requirement						
3: To support sustainable and diverse growth of the City's economy and maximise employment opportunities	rse growth of the City's alony and maximise Permitted applications for alternative uses within established employment areas protected in the						
4: Improve the physical health and wellbeing of residents and reduce health inequalities	Proportion of development for over 30 homes or 1000 sq metres that provide a health impact assessment.	Planning application checks					
5: Promote high quality design in new development and improve the character of the built environment	■ Proportion of new development coming forward on brownfield land.	■ Planning application checks					
6: To support community cohesion and safety	Number of new community facilities developed.	 Planning applications checks 					
7: To provide good access to services, facilities and education	■ Total gains and losses of services and facilities.	■ Devon County Council					

SA Objectives	Indicators	Possible Data Sources				
	 Progress of infrastructure delivery identified in the Infrastructure Delivery Plan. Amount of money received in developer contributions through development. 	 Annual infrastructure funding statement 				
8: To reduce the need to travel by private vehicle and encourage sustainable and active alternatives	 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. 	Planning application checksDevon County Council				
9: To protect residential amenity by reducing air, noise and light pollution	■ Planning application checks					
10: To conserve and enhance biodiversity and geodiversity	Biodiversity net gains achieved through development.	Planning application checksFuture net gain monitoring database				
11: To conserve and enhance the character and distinctiveness of the landscape	ne character and distinctiveness work.					
12: To conserve and enhance the historic environment including the setting of heritage assets	 Condition of Conservation Areas. Number and condition of buildings on the Heritage at Risk register. 	Conservation area appraisalsHistoric 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	sk from all sources and to otect the quality and quantity water resources Percentage of water bodies at good ecological status or potential. Percentage of water bodies assessed at good chemical status.					
14: To support efficient use of resources, including land, minerals and waste	esources, including land,					

SA Objectives	Indicators	Possible Data Sources
	Amount of development coming forward in mineral safeguarding areas or waste consultation zones against DCC advice.	

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Conclusions

- **1.36** The strategic policy options, site options and policy options in the Outline Draft Exeter Plan have been subject to detailed appraisal against the SA objectives.
- 1.37 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.

Next Steps

- **1.38** The full SA Report and this Non-Technical Summary will be available for a period of representation alongside the Outline Draft Plan document, between September and November 2022.
- **1.39** 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